Kingsford Parsons TV renewal / minor mod MM05 draft permit

10 messages

Chertkovsky, Natalya V <natalya.v.chertkovsky@wv.gov> Tue, Aug 27, 2024 at 1:04 PM
To: Eric Copenhaver <ERIC.COPENHAVER@clorox.com>

Hello Eric,
I'm working on the TV permit for Parsons and have a few quick questions.
I noticed, the 10,000 gal gasoline tank E-0A-01 installed in 1988 was replaced with a 500 gal gasoline tank in 2020 . Part 63 Subpart CCCCCC is applicable to the tank (the applicability discussion is included with your TV renewal application - thank you).
1) Was the tank replacement included with any of the R13/TV permit modifications?
2) Is it the only unit subject to the Subpart CCCCCC?
3) Is the affected source (GDF) considered a "reconstructed" or "new source" for the purposes of this Subpart?
4) Were you in compliance with the Subpart since the tank was installed in 2020? (according to the 40.CFR.63-11113(a)(2) "If you start up your affected source after January 10, 2008, you must comply with the standards in this subpart upon startup of your affected source.").
Please, let me know if you have any questions.
Thank you in advance for your cooperation.

Sincerely,
Natalya Chertkovsky
TV Permit Engineer
WV DEP DAQ
304-926-0499 x 41250

Eric Copenhaver <ERIC.COPENHAVER@clorox.com> Wed, Aug 28, 2024 at 12:05 PM
To: "Chertkovsky, Natalya V" <natalya.v.chertkovsky@wv.gov>

Hi Natalya,

I had to travel out to San Diego to help an elderly relative this week and be back Friday. I will take a look but would it be ok if we talk Monday.

Eric

From: Chertkovsky, Natalya V <natalya.v.chertkovsky@wv.gov>
Sent: Tuesday, August 27, 2024 1:04 PM
To: Eric Copenhaver <ERIC.COPENHAVER@CLOROX.COM>
Subject: Kingsford Parsons TV renewal / minor mod MM05 draft permit

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Chertkovsky, Natalya V <natalya.v.chertkovsky@wv.gov> Wed, Aug 28, 2024 at 12:10 PM
To: Eric Copenhaver <ERIC.COPENHAVER@clorox.com>

Hi Eric,
Thank you for the update, and safe travels.
I was trying to submit the draft to Carrie this week. Does Michael Zeiders know anything about it, and can help?
Or, maybe we can discuss it on Friday when you come back?
Thank you again,
Natalya
[Quoted text hidden]

Eric Copenhaver <ERIC.COPENHAVER@clorox.com> Mon, Sep 9, 2024 at 3:21 PM
To: "Chertkovsky, Natalya V" <natalya.v.chertkovsky@wv.gov>
Cc: "Michael Zeiders (mzeiders@libertyenviro.com)" <mzeiders@libertyenviro.com>

Hi Natalya,

See response to questions below.

Hello Eric,

I'm working on the TV permit for Parsons and have a few quick questions.

I noticed, the 10,000 gal gasoline tank E-0A-01 installed in 1988 was replaced with a 500 gal gasoline tank in 2020 . Part 63 Subpart CCCCCC is applicable to the tank (the applicability discussion is included with your TV renewal application - thank you).

1) Was the tank replacement included with any of the R13/TV permit modifications?

No. We told WV about the replacement in our Title V permit renewal application. We also indicated that monthly throughput is <500 gal and that the new tank was installed in 2020.

2) Is it the only unit subject to the Subpart CCCCCC?

Yes this is the only unit subject to subpart CCCCCC

3) Is the affected source (GDF) considered a "reconstructed" or "new source" for the purposes of this Subpart?

Yes, since we completely replaced the old 10,000 gallon tank.

4) Were you in compliance with the Subpart since the tank was installed in 2020? (according to the 40.CFR.63-11113(a)(2) "If you start up your affected source after January 10, 2008, you must comply with the standards in this subpart upon startup of your affected source.").

Yes. We track monthly gasoline throughput and to follow the work practice standards required.

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Chertkovsky, Natalya V <natalya.v.chertkovsky@wv.gov> Mon, Sep 9, 2024 at 3:23 PM
To: Eric Copenhaver <ERIC.COPENHAVER@clorox.com>

Eric, thank you for your feedback!
Is answer to question 3 “reconstructed” or “new”?
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Eric Copenhaver <ERIC.COPENHAVER@clorox.com> Mon, Sep 9, 2024 at 3:55 PM
To: "Chertkovsky, Natalya V" <natalya.v.chertkovsky@wv.gov>

Sorry -- New

From: Chertkovsky, Natalya V <natalya.v.chertkovsky@wv.gov>
Sent: Monday, September 9, 2024 3:23 PM
To: Eric Copenhaver <ERIC.COPENHAVER@CLOROX.COM>
Subject: Re: Kingsford Parsons TV renewal / minor mod MM05 draft permit

[External Email - Email externo - 外部邮箱]

Eric, thank you for your feedback!

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Chertkovsky, Natalya V <natalya.v.chertkovsky@wv.gov> Mon, Sep 9, 2024 at 3:55 PM
To: Eric Copenhaver <ERIC.COPENHAVER@clorox.com>

Thank you!

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Chertkovsky, Natalya V <natalya.v.chertkovsky@wv.gov> Thu, Sep 12, 2024 at 4:44 PM
To: Eric Copenhaver <ERIC.COPENHAVER@clorox.com>, Michael Zeiders <mzeiders@libertyenviro.com>

Hi Eric,
Please, find the attached draft renewal permit and renewal fact sheet for your review.
Please, let me know if you have any questions or comments by September 25, 2024.
Thank you!
Sincerely,
Natalya Chertkovsky
[Quoted text hidden]

2 attachments

DPPermit_Renewal2024-updated.docx
463K

DPFactSheet_Renewal2024.docx
187K

Eric Copenhaver <ERIC.COPENHAVER@clorox.com> Wed, Sep 25, 2024 at 3:23 PM
To: "Chertkovsky, Natalya V" <natalya.v.chertkovsky@wv.gov>
Cc: Steve Waitman <STEVE.WAITMAN@clorox.com>, "Michael Zeiders (mzeiders@libertyenviro.com)" <mzeiders@libertyenviro.com>

Hi Natalya,

We don't see any issues, one comment is that it's believed that the fabric filters are 99% efficient rather than the 90% documented for C-39 and

C-40 on page 6.

Thanks,

Eric Copenhaver

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Chertkovsky, Natalya V <natalya.v.chertkovsky@wv.gov> Thu, Sep 26, 2024 at 11:00 AM
To: Eric Copenhaver <ERIC.COPENHAVER@clorox.com>

Hi Eric,
Thank you for your timely comments! I changed the fabric filters efficiency to 99%.
The permit is going out to notice on October 2, 2024.
Thanks again!
Sincerely,
Natalya Chertkovsky

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West Virginia Department of Environmental Protection

Harold D. Ward
Cabinet Secretary

Permit to Operate

Pursuant to

Title V

of the Clean Air Act

Issued to:

Kingsford Manufacturing Company
Parsons Plant
R30-09300004-2024

Laura M. Crowder
Director, Division of Air Quality

Issued: [Date of issuance] • *Effective: [Equals issue date plus two weeks]*
Expiration: [5 years after issuance date] • *Renewal Application Due: [6 months prior to expiration]*

Permit Number: **R30-09300004-2024**
Permittee: **Kingsford Manufacturing Company**
Facility Name: **Parsons Plant**
Permitee Mailing Address: **P.O. Box 464, Parsons, WV 26287**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location:	180 Kingsford Lane, Parsons, Tucker County, West Virginia
Facility Mailing Address:	P.O. Box 464, Parsons WV 26287
Telephone Number:	(304) 478-2911
Type of Business Entity:	Corporation
Facility Description:	Charcoal Manufacturing Facility
SIC Codes:	2861
UTM Coordinates:	613.2 km Easting • 4326.2 km Northing • Zone 17

Permit Writer: Natalya V. Chertkovsky-Veselova

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

Table of Contents

Source-specific Requirements

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1. Emission Units

Source ID	Emission Point ID	Equipment Description and ID	Year Installed/ Modified	Design Capacity or Allowable Limit	Control Device Description and ID
Wood, Char and Coal Piles					
E-01-01	S-09	Wood Pile Management	1972	N/A	None
E-01-02	S-09	Char Pile and Coal Pile Management	1958	N/A	Char and Coal Shed
Raw Material Handling					
E-02-01	S-09	Transfer Drag Pit to 48" Belt	2003	confidential	Partial Enclosure (C-24)
E-02-02	S-09	Primary Screening	2012	confidential	None
E-02-03	S-09	Secondary Screening	2016	45 tph	None
E-02-04	S-09	600 Ft Belt to Dryer Feed Bin	1972	confidential	Partial Enclosure (C-04)
E-02-05	S-09	Wood with Metal Bypass Belt	1972	confidential	None
E-02-06	S-09	Wood Dryer Bin Bypass Screw	1972	confidential	None
E-02-07	S-09	Char Truck Transport	1972	confidential	None
E-02-09	S-34	Char and Coal Truck Dumping	1963/2023	confidential	Truck Dump Scrubber (C-34)
E-02-0A	S-09	Bulk Coal Tank to Belt Transfer: coarse screener, screw conveyor & belt conveyor	1958	80,000 TPY	Partial Enclosure
E-02-0C	S-09	Char Hammer mill	2003	confidential	Full Enclosure
E-02-0D	S-09	Secondary Wood Hammer mill Primary Wood Hammer mill	1988 2003	confidential confidential	Full Enclosure Full Enclosure
E-02-0E	S-09	Bulk Lime Truck Unloading System	2015	15,000 TPY	Partial Enclosure
Wood Drying and Charring system					
E-03-01	S-01-01	Wood Dryer and Outlet Box (Mfg: Louisville)	2007	60 TPY	ACC (C-08)
		Retort Furnace (Mfg: Skinner)	1972	38.5 tph	ACC (C-08)
		Four (4) Dryer Cyclones C-05 Fisher-Klosterman XQ120-33	2003	58,372 ACFM	ACC (C-08)
		Four (4) Furnace Cyclones C-06 Fisher-Klosterman XQ120-23	1984	58,372 ACFM	ACC (C-08)
Briquet Dryers and Coolers					
E-03-02	S-01-03 S-01-04	Aeroglide Briquet Dryer #1 and a portion of ACC exhaust gases	1996	confidential	None

Source ID	Emission Point ID	Equipment Description and ID	Year Installed/ Modified	Design Capacity or Allowable Limit	Control Device Description and ID
E-03-03N	S-01N-05 S-01N-06	Aeroglide Briquet Dryer #2 and a portion of ACC exhaust gases	2003	confidential	None
E-04-01	S-02-01 S-02-02 S-02-03	Briquet Cooler #1	1996	confidential	None
E-04-02N	S-03N-01 S-03N-02 S-03N-03	Briquet Cooler #2	2003	confidential	None
Solvent Treated Briquet Production					
E-05-01[1]	19A[2] (ACC Stack S-01-01) 19B[2] (ACC Bypass Stack S-04)	#1 Weigh Conveyor	2023	20/13 TPH[3]	ACC[4] (C-08), Solvent Chiller
		Transfer Conveyor	2023		
		Spray Application	2023		
		Take-Away Conveyor	2023		
		#2 Weigh Conveyor	2023		
		Product Out Feed Conveyor	1982		
		Sump SMP-100	1982		
		Packaging Surge Bin	1982		
	S-32	Solvent tank #1	1982	15,000 gal	None
		Solvent tank #2	1982	15,000 gal	None
		Solvent tank #3	1982	10,000 gal	None
		Solvent tank #4	1982	10,000 gal	None
		Solvent tank #5	1982	10,000 gal	None
Minor Ingredients Batching System / Dry Storage					
E-06-01	S-10	Coal Tank	1982	250 ton	Fabric Filter Dust Collector (C-07)
E-06-02	S-10	Beryl Char Tanks	1981	two @ 60 ton	Fabric Filter Dust Collector (C-07)
E-06-03	S-11	Rerun Char Tank	1984	60 ton	None
E-06-04	S-13	Char Tank	1984	60 ton	Fabric Filter Dust Collector (C-11)
E-06-05	S-13	Parsons Retort Char Tanks and Transfer Point (Two Tanks)	1972/2019	two @ 60 ton	Fabric Filter Dust Collector (C-11)
	S-38	Retort Char Transfer Bin (One Bin)	2019	Unknown	Venturi Scrubber (C-38)
E-06-06	S-14	Bulk Lime Tank	2001	125 ton	Fabric Filter Dust Collector (C-12)
E-06-07	S-15	Bulk Nitrate Tank (out of service)	2001	34 ton	Fabric Filter Dust Collector (C-13)
E-06-08	S-16	Bulk Starch Tank	1958	101 ton	Fabric Filter Dust Collector (C-14)

Source ID	Emission Point ID	Equipment Description and ID	Year Installed/ Modified	Design Capacity or Allowable Limit	Control Device Description and ID
E-06-09	S-17	Lime Use Tank	1958 / 2016 / 2023	6 ton	Fabric Filter Dust Collector (C-15)
E-06-10	S-39	6,000 ft^3 lignite storage tank	2024	6,000 ft^3	Fabric Filter (C-39)
E-06-11	S-40	295 ft^3 lignite use tank	2024	295 ft^3	Fabric Filter (C-40)
E-06-0A	S-18*	Wet Starch Use Tank	1980	3 ton	Fabric Filter Dust Collector (C-16)
E-06-0C	S-20*	Borax Use Tank	1980	1 ton	Fabric Filter Dust Collector (C-18)
E-06-0E	S-22	Muller Vent	1976	N/A	Vent (C-20), wet material (90%control)
E-06-0F	S-23	Minors Batch Mixing (starch, nitrate and borax mixing tanks)	1994 / 2002	confidential	Wet Scrubber (C-21), (99.5% PM control)
		Natural Gas Burning			
E-07-01	S-07-01	Secondary ACC Burner (Stack S-01-01) Mfg: North American (Model #4796-20)	2003	50 MM BTU/hr	None
		Primary ACC Burner (Stack S-01-01) Mfg: North American, (Model #4796-18)	1972	43 MM BTU/hr	None
		Furnace Burners (Stack S-01-01) Mfg: Eclipse	1972	4 @ 2 MMBTU/hr	ACC
		Waste Heat Boiler (Stack S-01-02) Mfg: North American, (Model #4121-7.0-B.13)	1982	7.83 MM BTU/hr	None
		Auxiliary Heat Burner Mfg. Eclipse V2 (Stacks S-01-03, S-01-04, S-01N-05, S-01N-06) - provides heat to the Briquet Dryers when the ACC is not operating	2002	83 MM BTU/hr	None
		Briquet Handling			
E-08-01	S-06	Briquet Dryer discharge conveyors (Manufacturing & Briquet take-away)	1983 / 2003	confidential	Fabric Filter Dust Collector (C-01)
E-08-02A	S-07	Briquet Packaging Lines - Weigh Scales	1991	confidential	Fabric Filter Dust Collector (C-02)
E-08-02B	S-07	Briquet Packaging Lines - Bag filling operation	1991	confidential	Fabric Filter Dust Collector (C-02)
E-08-03A	S-08	Finished Briquet Handling - Silo in-feed bucket elevator	1977	confidential	Fabric Filter Dust Collector (C-03)
E-08-03B	S-08	Finished Briquet Handling - Silo in-feed conveyor	2003	confidential	Fabric Filter Dust Collector (C-03)

Source ID	Emission Point ID	Equipment Description and ID	Year Installed/ Modified	Design Capacity or Allowable Limit	Control Device Description and ID
E-08-03C	S-08	Finished Briquet Handling - Briquet Storage Silos	1977	4 silos @ 60 tons each	Fabric Filter Dust Collector (C-03)
E-08-03D	S-08	Finished Briquet Handling - Line-A take-away conveyors	1991	confidential	Fabric Filter Dust Collector (C-03)
E-08-03E	S-08	Finished Briquet Handling - Line-B take-away conveyors	1991	confidential	Fabric Filter Dust Collector (C-03)
E-08-03F	S-08	Finished Briquet Handling - Line-A bucket elevator	1977	confidential	Fabric Filter Dust Collector (C-03)
E-08-03G	S-08	Finished Briquet Handling Line-A transfer conveyors	1977	confidential	Fabric Filter Dust Collector (C-03)
E-08-03H	S-35	Packaging Scale Bin In Feed	1977 / 2011	confidential	Fabric Filter Dust Collector (C-35)
Plant Roads					
E-09-01	S-09	Paved Plant Roads	Various	NA	None
E-09-02	S-09	Unpaved Plant Roads	1958	NA	None
Liquid Storage					
E-0A-01	S-25	Unleaded Gasoline	2020	500 gal	Conservation Vent (C-25)
E-0A-02	S-26	Diesel Fuel	1988	10,000 gal	Conservation Vent (C-26)
E-0A-03	S-27	Kerosene	1988	500 gal	Conservation Vent (C-27)
E-0A-08	S-32	Used Oil	1996	500 gal	Vent (C-32)
Emergency equipment					
E-0B-01	N/A	Emergency Diesel Flood Pumps	1998	115 hp/pump 4@ 2500 gpm	None
E-0B-02	S-36	Natural Gas Emergency Generator	2012	228 bhp @ 1800rpm	Catalyst
FP-2	S-33	South JX6h-UF30 Diesel Fire Pump	2008	420 bhp/1760 rpm	None
N/A	S-37	Diesel Fuel Storage Tank	2008	550 gal.	None
Control Devices					
N/A	S-01-01, 19A	After Combustion Chamber C-08 95% destruction efficiency for VOC	2003	370,000 ACFM	Stack Cap (when ACC is not in use)

Source ID	Emission Point ID	Equipment Description and ID	Year Installed/ Modified	Design Capacity or Allowable Limit	Control Device Description and ID
N/A	19A, 19B	Solvent chiller Mfg: Carrier, Model: 30RAN045J-601DT	2002	Unknown	None
N/A	S-06	Fabric Filter Dust Collector (C-01) Mfg: Pneumafil, Model: 11.5-3168	1992	15,000 CFM	None
N/A	S-07	Fabric Filter Dust Collector (C-02) Mfg: Standard Havens, Model: 24A/M1	1992	30,000 CFM	None
N/A	S-08	Fabric Filter Dust Collector (C-03), Mfg: BHA / DCE Volkes	1995	25,000 CFM	None
N/A	S-10	Fabric Filter Dust Collector (C-07) Mfg: Adaptive Engr., Model BVC-36	2003	560 CFM	None
N/A	S-13	Fabric Filter Dust Collector (C-11) Mfg Mac Process, Inc., Model 96 RT 52, Style III	2012/2019	1366 CFM	None
N/A	S-14	Fabric Filter Dust Collector (C-12) Mfg: Adaptive Engr., BVC-36X	2003	560 CFM	None
N/A	S-15	Fabric Filter Dust Collector (C-13) Mfg: Adaptive Engr., BVC-36X	2001	560 CFM	None
N/A	S-16	Fabric Filter Dust Collector (C-14) Mfg: Adaptive Engr., BVC-36X	2003	560 CFM	None
N/A	S-17	Fabric Filter Dust Collector (C-15) Mfg: Schenck Process 39AVRC14, Style II	2023	560 CFM	None
N/A	S-18*	Fabric Filter Dust Collector (C-16) Griffin, Model JV-54-4X	1993	425 CFM	None
N/A	S-20*	Fabric Filter Dust Collector (C-18) Griffin, Model JV-54-4X	1993	Unknown	None
N/A	S-23	Wet Scrubber (C-21) Mikropul Type DS2-30	1976	99.5% PM	None
N/A	S-34	Wet Scrubber (C-34) Mfg: MikroPul Mikrovane, Size 66, Type LN	2003	15,000 CFM	None
N/A	S-35	Fabric Filter Dust Collector (C-35) Wheelabrator, Model 55	2011	8,500 CFM	None
N/A	S-38	Venturi Scrubber (C-38)	2019	1200 CFM, 90+ % PM	None
N/A	S-39	Fabric Filter (C-39)	2024	90% PM	None
N/A	S-40	Fabric Filter (C-40)	2024	90% PM	None

* Emission Point located indoors

(1) Single Emission Unit ID for all the Solvent Treated Briquets (STB) operations.

(2) Emission point 19A is the ACC stack, and emission point 19B is the ACC bypass stack.

(3) Based on the throughput limited under 7.1.6

(4) ACC = After Combustion Chamber. The STB operations are permitted to bypass the ACC pursuant to the requirements of this permit. The Solvent Chiller minimizes solvent evaporative losses and is used at all times.

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-1608N	July 26, 2024
R14-0001E	August 14, 2023
G60-C012A	August 21, 2012

2.0 General Conditions

2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.39.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

2.2. Acronyms

CAAA	Clean Air Act Amendments	**NSPS**	New Source Performance Standards
CBI	Confidential Business Information	**PM**	Particulate Matter
CEM	Continuous Emission Monitor	**PM_{10}**	Particulate Matter less than 10μm in diameter
CES	Certified Emission Statement	**pph**	Pounds per Hour
C.F.R. *or* CFR	Code of Federal Regulations	**ppm**	Parts per Million
CO	Carbon Monoxide	**PSD**	Prevention of Significant Deterioration
C.S.R. *or* CSR	Codes of State Rules	**psi**	Pounds per Square Inch
DAQ	Division of Air Quality	**SIC**	Standard Industrial Classification
DEP	Department of Environmental Protection	**SIP**	State Implementation Plan
FOIA	Freedom of Information Act	**SO_2**	Sulfur Dioxide
HAP	Hazardous Air Pollutant	**TAP**	Toxic Air Pollutant
HON	Hazardous Organic NESHAP	**TPY**	Tons per Year
HP	Horsepower	**TRS**	Total Reduced Sulfur
lbs/hr *or* lb/hr	Pounds per Hour	**TSP**	Total Suspended Particulate
LDAR	Leak Detection and Repair	**USEPA**	United States Environmental Protection Agency
m	Thousand	**UTM**	Universal Transverse Mercator
MACT	Maximum Achievable Control Technology	**VEE**	Visual Emissions Evaluation
mm	Million	**VOC**	Volatile Organic Compounds
mmBtu/hr	Million British Thermal Units per Hour		
$mmft^3$/hr *or* mmcf/hr	Million Cubic Feet Burned per Hour		
NA *or* N/A	Not Applicable		
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		
NO_x	Nitrogen Oxides		

2.3. Permit Expiration and Renewal

2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]

2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]

2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]

2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

2.5.1. This permit shall be reopened and revised under any of the following circumstances:

a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.

b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.

c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

a. The change must meet all applicable requirements and may not violate any existing permit term or condition.

b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield.

d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9.]

2.11. Operational Flexibility

2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.
[45CSR§30-5.8]

2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.
[45CSR§30-5.8.a.]

2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or

b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
[45CSR§30-2.40]

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.

b. The permit shield shall extend to all terms and conditions under each such operating scenario; and

c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.
[45CSR§30-5.1.f.2.]

2.17. Reserved

2.18. Federally-Enforceable Requirements

2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.
[45CSR§30-5.2.a.]

2.18.2. Those provisions specifically designated in the permit as “State-enforceable only” shall become “Federally-enforceable” requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.
[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.
[45CSR§30-4.2.]

2.21. Permit Shield

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.
[45CSR§30-5.6.a.]

2.21.2. Nothing in this permit shall alter or affect the following:

a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or

b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.

c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.
[45CSR§30-5.3.e.3.B.]

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.
[45CSR§30-5.1.e.]

2.24. Property Rights

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.
[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.

b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.

c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.
[45CSR§30-5.1.a.2.]

3.0 Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1. **[45CSR§6-3.1.]**

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40 C.F.R. §61.145(b) and 45CSR34]

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]

3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2]

3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]

3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]

3.1.9. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation greater than twenty (20) percent opacity, except as noted in 45CSR§§7-3.2 (3.1.10), 3.3, 3.4, 3.5, 3.6, and 3.7 (3.1.11.).
[45CSR§7-3.1, 45CSR13, R13-1608, 4.1.15]

3.1.10. The provisions of 45CSR§7-3.1 (3.1.9) shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.
[45CSR§7-3.2]

3.1.11. No person shall cause, suffer, allow, or permit emissions of smoke and/or particulate matter into the open air from any storage structure(s) associated with any manufacturing process(es) that pursuant to subsection 5.1. [of 45CSR7] is required to have a full enclosure and be equipped with a particulate matter control device.
[45CSR§7-3.7]

3.1.12. No person shall cause suffer, allow or permit particulate matter to be vented into the open air from any type of source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of 45CSR7.
[45CSR§7-4.1]

3.1.13. No person shall cause, suffer, allow or permit any manufacturing process generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR§7-5.1]

3.1.14. The 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. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.

The control devices and procedures, specified in the Permit Applications R13-1608 through R13-1608N and any following amendments, shall be maintained and operated to control and minimize any fugitive escape of pollutants including but not limited to: enclosures, water sprays with winterization (on outside material handling operations and plant roads), bin vents with fabric filters, and dust collectors.
[45CSR§7-5.2, 45CSR13, R13-1608, 4.1.14.]

3.1.15. Due to unavoidable malfunction of equipment, emissions exceeding those provided for in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four-(24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
[45CSR§7-9.1 and 45CSR13, R13-1608, 4.1.16]

3.1.16. The permittee shall comply with all applicable requirements of 40 CFR 60 Subpart Y (Standards of Performance for Coal Preparation Plants), including but not limited to:

40 C.F.R.§60.254 Standards for Particulate Matter:

(a) On and after the date on which the performance test required to be conducted by 40CFR60.8 is completed, an owner or operator subject to the provisions of 40 C.F.R. 60 Subpart Y shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal constructed, reconstructed, or modified on or before April 28, 2008, gases which exhibit 20 percent opacity or greater.

40 C.F.R.§ 60.257 Test methods and procedures:

(a) The owner or operator must determine compliance with the applicable opacity standards as specified in paragraphs (a)(1) through (3) of this section.

(1) Method 9 of appendix A-4 of this part and the procedures in § 60.11 must be used to determine opacity, with the exceptions specified in paragraphs (a)(1)(i) and (ii).

(i) The duration of the Method 9 of appendix A-4 of this part performance test shall be 1 hour (ten 6-minute averages).

(ii) If, during the initial 30 minutes of the observation of a Method 9 of appendix A-4 of this part performance test, all of the 6-minute average opacity readings are less than or equal to half the applicable opacity limit, then the observation period may be reduced from 1 hour to 30 minutes.

(2) To determine opacity for fugitive coal dust emissions sources, the additional requirements specified in paragraphs (a)(2)(i) through (iii) must be used.

(i) The minimum distance between the observer and the emission source shall be 5.0 meters (16 feet), and the sun shall be oriented in the 140-degree sector of the back.

(ii) The observer shall select a position that minimizes interference from other fugitive coal dust emissions sources and make observations such that the line of vision is approximately perpendicular to the plume and wind direction.

(iii) The observer shall make opacity observations at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. Water vapor is not considered a visible emission.

(3) A visible emissions observer may conduct visible emission observations for up to three fugitive, stack, or vent emission points within a 15-second interval if the following conditions specified in paragraphs (a)(3)(i) through (iii) of this section are met.

(i) No more than three emissions points may be read concurrently.

(ii) All three emissions points must be within a 70 degree viewing sector or angle in front of the observer such that the proper sun position can be maintained for all three points.

(iii) If an opacity reading for any one of the three emissions points is within 5 percent opacity from the applicable standard (excluding readings of zero opacity), then the observer must stop taking readings for the other two points and continue reading just that single point.

Compliance with 45CSR§§7-3.1 and 3.7 in conditions 3.1.9 and 3.1.11 shall demonstrate compliance with 40CFR§60.254(a) for sources E-01-02 (Char Pile and Coal Pile Management), E-02-09 (Char and Coal Truck Dumping), E-02-0A (Bulk Coal Tank to Belt Transfer) and E-06-01 (Coal Tank).
[45CSR16 and 40 C.F.R. §§60.254(a) and 60.257(a)]

3.1.17. Maintenance operations (as defined in 45CSR7) shall be exempt from the provisions of 45CSR§7-4 provided that at all times the owner or operator shall conduct maintenance operations in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source.
[45CSR§7-10.3 and 45CSR13, R13-1608, 4.1.17]

3.1.18. An owner or operator may apply for an alternative visible emission standard for start-up and shutdown periods, on a case-by-case basis, by filing a written petition with the Director. The Director may approve an alternative visible emission standard for start-ups and shutdowns to the visible emission standard required under 45CSR§7-3. The petition shall include a demonstration satisfactory to the Director: a) That it is technologically or economically infeasible to comply with 45CSR§7-3; b) That establishes the need for approval of a start-up or shutdown plan based upon information including, but not limited to, monitoring results, opacity observations, operating procedures and source inspections. c) That the particulate matter weight emission standards under 45CSR§7-4 are being met, as determined in accordance with 45CSR7A - "Compliance Test Procedures For 45CSR7 – "To Prevent and Control Particulate Air Pollution From Manufacturing Process Operations"; and d) That during periods of start-ups and shutdowns the owner or operator shall, to the extent practicable, maintain and operate any manufacturing process including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source.
[45CSR§7-10.4]

3.1.19. The permittee shall develop, maintain and implement procedures on startup, shutdown and maintenance activities to help ensure they are conducted in a manner consistent with provisions of this Permit. At the request of the Director, or his or her duly authorized representative, such data shall be made available for inspection or copying.
[45CSR§30-12.7]

3.1.20. Due to unavoidable malfunction of equipment or inadvertent fuel shortages, emissions exceeding those provided for in 45CSR10 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the equipment malfunction or fuel shortage. In cases of major equipment failure or extended shortages of conforming fuels, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
[45CSR§10-9.1]

3.1.21. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 of permit R13-1608 (i.e., equipment associated with emission points S-01-01, S-01-03, S-01-04, S-01N-05, S-01N-06, S-02-02, S-02-03, S-02N-01, S-03N-01 through 03, S-06 through 08, S-07-01, S-09, S-13, S-14, S-15,S-16, S-17, S-18, S-20, S-22, S-23, S-25, S-37, S-38, S-39, and S-40) and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR13, R13-1608, 4.1.18]

3.2. Monitoring Requirements

3.2.1. Compliance with Section 3 of 45CSR7 and with requirement of Section 5.1.2 of this Permit shall be determined by conducting visible emission checks in accordance with Method 22 of 40 C.F.R. 60, Appendix A for all the emission points listed in Emission Units Table 1.1 and units emitting directly into the open air from points other than a stack outlet (including visible fugitive dust emissions that leave the plant site boundaries). These checks shall be conducted during periods of facility operation. If sources of visible emissions are identified during the checks, or at any other time, the permittee shall conduct an opacity evaluation as outlined in 45CSR§7A-2.1.a,b within a 24 hour period unless the permittee can demonstrate a valid reason that the time frame should be extended (except for Dry Storage tanks, see Requirement 8.2.3). A 45CSR§7A-2.1.a,b evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions.
[45CSR§30-5.1.c and 45CSR13, R13-1608, 4.2.2]

3.2.2. **Proper maintenance (CAM).** At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. **[45CSR§30-5.1.c and 40C.F.R. §64.7(b)]** *(Fabric Filters C-01, C-02, C-03 and ACC C-08)*

3.2.3. **Continued operation (CAM).** Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
[45CSR§30-5.1.c and 40C.F.R. §64.7(c)] *(Fabric Filters C-01, C-02, C-03 and ACC C-08)*

3.2.4. **Response to excursions or exceedances (CAM).**

(1) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-

up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[45CSR§30-5.1.c and 40 C.F.R. §64.7(d)] *(Fabric Filters C-01, C-02, C-03 and ACC C-08)*

3.2.5. **Documentation of need for improved monitoring (CAM).** After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
[45CSR§30-5.1.c and 40 C.F.R. §64.7(e)] *(Fabric Filters C-01, C-02, C-03 and ACC C-08)*

3.2.6. **Quality improvement plan (QIP) requirements.** Based on the results of a determination made under Condition 3.2.4(2) (§64.7(d)(2)), the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with §64.6(c)(3), the part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.
[45CSR§30-5.1.c and 40 C.F.R. §64.8(a)] *(Fabric Filters C-01, C-02, C-03 and ACC C-08)*

3.2.7. **Emission Limit Averaging Time.** Unless otherwise specified, compliance with all annual limits shall be based on a rolling twelve month total. A rolling twelve month total shall be the sum of the measured parameter of the previous twelve calendar months. Compliance with all hourly emission limits shall be based on the applicable NAAQS averaging times or, where applicable, as given in any approved performance test method. **[45CSR14, R14-0001, 3.2.1]**

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language.

2. The result of the test for each permit or rule condition.

3. A statement of compliance or non-compliance with each permit or rule condition.

[WV Code §§ 22-5-4(a)(14-15) and 45CSR13]

3.3.2. The Director or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions.
[45CSR§7-8.2]

3.3.3. The permittee shall demonstrate compliance with the ACC emission limits set forth under Requirement 4.1.3, and the Briquet Dryers' and Briquet Coolers' emission limits set forth under Requirements 6.1.2 and 6.1.3, by conducting performance tests utilizing the methods listed below. The performance tests shall be performed at the maximum hourly processing rate (as per Requirements 4.1.1 and 6.1.1) for: a) ACC stack and Briquet Dryers' stacks at the normal operating scenario (a portion of ACC gases are vented through the Briquet Dryers as the heat supply) at the same operating parameters during all the tests (no more than 5% deviation of processing rates, 10% for the ACC); b) Briquet Coolers' stacks. STB operations shall be vented to the ACC at the time of the tests. Emission factors shall be developed for each emission point based on results of the tests as follows: for ACC stack pollutants - in pounds per one ton of dry wood processed; for Briquet Dryers' stacks gaseous pollutants - in pounds per one ton of dry wood processed; for Briquet Dryers' and Briquet Coolers' PM/PM_{10} pollutants - in pounds per one ton of dry charcoal briquets processed.

A test protocol shall be submitted to the DAQ by the permittee at least thirty (30) days prior to the test and shall be approved by the Director. The Director shall be notified at least fifteen (15) days in advance of the actual dates and times during which the test will be conducted.

Test Method	Pollutant
EPA Reference Method 5	PM
EPA Reference Method 201 and 202	PM_{10}
EPA Reference Method 6	SO_2
EPA Reference Method 7E	NO_x
EPA Reference Method 10	CO
EPA Reference Method 18 or 25	VOC

This compliance testing shall be conducted in accordance with corresponding U.S. EPA test method.

The Director may require a different test method or approve an alternative method in light of any new technology advancements or special operating conditions that may occur.

[45CSR§30-5.1.c]

3.3.4. Stack testing per Requirement 3.3.3 shall be performed in accordance with 40 C.F.R. 60, Appendix A, once per permit term and within the first year of each subsequent permit term. Results from such testing shall be submitted to the Director within sixty (60) days from the date of completion of said testing. The test shall demonstrate that the tested units can operate at the maximum processing rate specified in Requirements 4.1.1 and 6.1.1 in compliance with the emissions limits set forth in Requirements 4.1.3, 6.1.2 and 6.1.3.

[45CSR§30-5.1.c]

3.4. Recordkeeping Requirements

3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A; 45CSR13, R13-1608, 4.4.1 and 45CSR14, R14-0001, 4.4.1]

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.
[45CSR§30-5.1.c.2.B.]

3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§30-5.1.c. State-Enforceable only.]

3.4.4. The permittee shall keep on site facility monthly natural gas bills with the amount of natural gas stated in order to be able to account for emissions associated with natural gas combustion**.** Records shall be maintained in accordance with Condition 3.4.2. above.
[45CSR§30-5.1.c and 45CSR13, R13-1608, 4.2.1]

3.4.5. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
[45CSR§30-5.1.c and 45CSR13, R13-1608, 4.4.2 and R14-0001, 4.4.2]

3.4.6. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

[45CSR§30-5.1.c and 45CSR13, R13-1608, 4.4.3 and R14-0001, 4.4.3]

3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
[45CSR§§30-4.4. *and* 5.1.c.3.D.]

3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
[45CSR§30-5.1.c.3.E.]

3.5.3. Except for the electronic submittal of the annual compliance certification and semi-annual monitoring reports to the DAQ and USEPA as required in 3.5.5 and 3.5.6 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class or by private carrier with postage prepaid to the address(es), or submitted in electronic format by e-mail as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

US EPA:

Section Chief
U. S. Environmental Protection Agency, Region III
Enforcement and Compliance Assurance Division
Air, RCRA and Toxics Branch (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2852

DAQ Compliance and Enforcement[1]:
DEPAirQualityReports@wv.gov

[1]For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status reports, Initial Notifications, etc.

3.5.4. **Fees.** The permittee shall pay fees on an annual basis in accordance with 45CSR§30-8.
[45CSR§30-8.]

3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification. The annual certification shall be submitted in electronic format by e-mail to the following addresses:

DAQ:
DEPAirQualityReports@wv.gov

US EPA:
R3_APD_Permits@epa.gov

[45CSR§30-5.3.e.]

3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. The semi-annual monitoring reports shall be submitted in electronic format by e-mail to the following address:

DAQ:
DEPAirQualityReports@wv.gov

[45CSR§30-5.1.c.3.A.]

3.5.7. **Reserved.**

3.5.8. **Deviations.**

a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Reserved.

2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or email. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.

4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.
[45CSR§30-5.1.c.3.B.]

3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.
[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

3.6.1. None.

3.7. Permit Shield

3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

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.
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_2 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.

Requirement	Regulatory Citation	Basis for Non-Applicability
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^3) and construction date (see **40CFR60 Subpart Kb Applicability Table** 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
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 JJJJJJ	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 JJJJJJ.

4.0 Wood Drying and Charring Requirements

4.1. Limitations and Standards

4.1.1. The Wood Dryer/Retort Furnace system (E-03-01) processing rate shall not exceed 38.5 tons per hour of dry wood and 209,000 tons per year of dry wood.
[45CSR13, R13-1608, 4.1.2]

4.1.2. Emissions generated as a result of the operation of the Wood Dryer/Retort Furnace (E-03-01) shall be routed to and combusted by the After Combustion Chamber (ACC, control device C-08) prior to their release to the atmosphere.
[45CSR13, R13-1608, 4.1.5]

4.1.3. Emissions to the atmosphere from the Wood Dryer/Retort Furnace (E-03-01) vented through ACC stack (Emission point S-01-01) shall be limited to the following when the Briquet Dryers are in operation:

Emission Point ID	Pollutant	Maximum Allowable Emissions (lbs/hr)	Maximum Allowable Emissions (TPY)
S-01-01	NO_x	74.4	201.88
	CO	5.9	1.0
	VOC	1.0	1.15
	SO_2	20.23	54.91
	PM	50.6	137.28
	PM_{10}	40.5	109.82
	Methanol	-	3.15

[45CSR13, R13-1608, **4.1.7 and 45CSR§7-4.1**]

Compliance with the hourly PM emission limits set forth in this Requirement will demonstrate compliance with 45CSR§7-4.1 maximum allowable PM emission rates.

4.1.4. The control devices in the Emission Units Table 1.0. for the Wood Dryer and Retort Furnace shall be maintained and operated as per requirement 3.1.21.
[45CSR§30-12.7]

4.1.5. The permittee shall inspect all control systems, specified in the Emission Units Table 1.0 for the Wood Dryer and Retort Furnace, weekly to ensure that they are operated and maintained in conformance with their designs.
[45CSR§30-5.1.c]

4.2. Monitoring Requirements

4.2.1. The permittee shall monitor temperature of the cyclones' gas flow in order to assure compliance with the Requirement 4.1.4.
[45CSR§30-5.1.c]

4.3. Testing Requirements

4.3.1. Testing per Section 3.3 Requirements.

4.4. Recordkeeping Requirements

4.4.1. Compliance with the hourly maximum processing rates listed in Requirement 4.1.1 shall be calculated on the basis of a rolling 30-day average expressed in tons per hour based on the hours of production for any specific 30-day period. Compliance with the yearly maximum processing rate in Requirement 4.1.1 shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of material processed, in tons, at the end of each month for that month and the previous 11 months.
[45CSR13, R13-1608, 4.1.4]

4.4.2. The following information shall be recorded and maintained in accordance with Condition 3.4.2 of this permit.:

a. amount of dry wood charged to the Wood Dryer/Retort Furnace (E-03-01) on a daily basis;
b. hours of operation for Wood Dryer and Retort Furnace on a daily basis;
c. hourly dry wood processing rate calculated as per Requirement 4.4.1.
d. yearly dry wood processing rate calculated as per Requirement 4.4.1.

[45CSR13, R13-1608, 4.2.1]

4.4.3. The permittee shall maintain records of the results of weekly inspections of the control systems per requirement 4.1.5. Records shall state the times the systems were inoperable, what corrective actions taken as a result of the weekly inspections and all scheduled and unscheduled maintenance procedures.
[45CSR§30-5.1.c]

4.5. Reporting Requirements

4.5.1. None.

4.6. Compliance Plan

4.6.1. N/A

5.0 After Combustion Chamber Requirements

5.1. Limitations and Standards

5.1.1. Summary of emissions to the atmosphere from ACC stack (Emission point S-01-01) and Briquet Dryers' stack (Emission points S-01-03, S-01-04, S-01N-05, S-01N-06) shall not exceed the following:

Emission Point ID	Pollutant	Hourly Emissions (lbs/hr)	Annual Emissions (TPY)
S-01-01 S-01-03 S-01-04 S-01N-05 S-01N-06	NO_x	87.5	237.51
	CO	11.9	13.31
	VOC	2.65	6.65
	SO_2	23.8	64.6
	PM	62.6	175.78
	PM_{10}	46.5	129.07
	Methanol	-	3.7

[45CSR13, R13-1608, 4.1.6]

5.1.2. No person shall cause, or allow the emission of particles of unburned or partially burned refuse or ash from any incinerator which are large enough to be individually distinguished in the open air.
[45CSR§6-4.5]

5.1.3. Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.
[45CSR§6-4.6]

5.1.4. No person shall cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations.
[45CSR§10-4.1]

5.1.5. The ACC shall be operated such that the average combustion chamber temperature does not drop more than 50℉ below temperature specified in Condition 5.2.2 for periods of time which do not exceed three (3) hours during normal operations (not including periods of system startup, shutdown or maintenance).
[45CSR13, R13-1608, 4.1.12]

5.2. Monitoring Requirements

5.2.1. **CAM monitoring requirement**. The permittee shall install, calibrate, maintain, and continuously operate a monitoring device with recorder for the measurement of the ACC combustion chamber temperature (E-03-01). The monitoring device is to be certified by the manufacturer to be accurate within + one (1) percent in degrees Fahrenheit. Accuracy of each thermocouple will be verified by a second thermocouple in the ACC stack. The validation check shall be conducted monthly. The acceptance criterion is +/- 50 ºF.
[45CSR13, R13-1608, 4.2.3, 45CSR§30-5.1.c and 40C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2)]

5.2.2. Compliance with the hourly emission limits set forth in Requirement 4.1.3 and 6.1.2 will be demonstrated if the ACC average combustion chamber temperature is maintained at or above a minimum of 1,600ºF on a rolling 3-hour average during normal operations (not including periods of system startup, shutdown or maintenance). The permittee may establish a lower ACC combustion chamber temperature by conducting a performance test at the lower temperature while demonstrating compliance with the emission limitations of paragraphs 4.1.3 and 6.1.2.
[45CSR13, R13-1608, 4.1.11, 45CSR§30-12.7 and 40C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2)]

5.2.3. **CAM monitoring requirement**. An excursion shall be defined as: if during normal operation, the 1-hour average ACC temperature drops below 1,600ºF . Excursions trigger an on-screen alarm, an inspection and evaluation, corrective action, recordkeeping and reporting requirements. The monitoring system shall continually sense the indicator, poll the indicator at least once per minute, compute 1-hour averages, and record 1-hour averages.
[45CSR§30-12.7 and 40C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2)]

5.2.4. **Visible emissions monitoring per Requirement 3.2.1.** Daily Method 22 checks shall be conducted for a minimum of 4 consecutive weeks for the ACC stack outlet (Emission Point S-01-01). If in compliance, then weekly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.1, then for this emission point monitoring shall revert back to the daily frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR13, R13-1608, 4.2.2]

5.2.5. Each opacity evaluation observation per 45CSR§7A-2.1.a, b as per Requirement 3.2.1 shall be a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) without averaging of results, unless any one single reading is greater than the opacity limit for the emission unit, in which case the observation period shall be extended to a 60 minutes or until a violation of the emissions standard per 45CSR§7-3.2 has been documented (more than twenty (20) single opacity readings are in excess of 20% opacity, but less than 40% opacity, or any single reading is equal or in excess of 40% opacity); whichever is the shorter period.
[45CSR§30-5.1.c]

5.3. Testing Requirements

5.3.1. Testing per Section 3.3. Requirements

5.4. Recordkeeping Requirements

5.4.1. Records of the combustion chamber temperature shall be maintained in accordance with Condition 3.4.2.
[45CSR13, R13-1608, 4.2.3]

5.4.2. To demonstrate compliance with Requirement 5.1.3 the permittee shall maintain a record of all odor complaints received. Such record shall contain an assessment of the validity of the complaints as well as any corrective actions taken.
[45CSR§30-5.1.c]

5.4.3. Visible emission checks recordkeeping as per requirement 5.2.4.

5.4.4. General Recordkeeping Requirements for 40 C.F.R. Part 64 (CAM)

(1) The combustion chamber temperature per Requirement 5.2.2 shall be recorded hourly.

a. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review and does not conflict with other applicable recordkeeping requirements.

[45CSR§30-5.1.c and 40 C.F.R. §64.9(b)]

5.5. Reporting Requirements

5.5.1. Reserved.

5.5.2. General Reporting Requirements for 40 C.F.R. Part 64 (CAM)

(1) On and after the date specified in 40 C.F.R. §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. Part 64, the permittee shall submit monitoring reports to the Director in accordance with permit condition 3.5.6.

(2) A report for monitoring under 40 C.F.R. Part 64 shall include, at a minimum, the information required under permit condition 3.5.8 and the following information, as applicable:

(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(iii) A description of the actions taken to implement a QIP (if required by 3.2.6) during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 C.F.R. §64.9(a) and 45CSR§30-5.1.c]

5.6. Compliance Plan

5.6.1. N/A

6.0 Briquet Dryers and Coolers Requirements

6.1. Limitations and Standards

6.1.1. The Briquet Dryer/Cooler system (E-03-02, E-03-03N, E-04-01, E-04-02N) processing rate shall not exceed 24 tons per hour of dry packaged briquets and 154,000 tons per year of dry packaged briquets (excluding weight of the solvent and packaging material).
[45CSR13, R13-1608, 4.1.3]

6.1.2. Total emissions to the atmosphere from the Briquet Dryers' (E-03-02 and E-03-03N) stacks (Emission points S-01-03, S-01-04, S-01N-05, S-01N-06) shall be limited to the following:

Emission Point ID	Pollutant	Maximum Allowable Emissions (lbs/hr)	Maximum Allowable Emissions (TPY)
S-01-03 S-01-04 S-01N-05 S-01N-06	NO_x	13.13	35.63
	CO	6.0	12.31
	VOC	1.65	5.5
	SO_2	3.57	9.69
	PM	12	38.5
	PM_{10}	6	19.25
	Methanol	-	0.55

[45CSR13, R13-1608, 4.1.8]

6.1.3. Total emissions to the atmosphere from the Briquet Coolers' (E-04-01 and E-04-02N) stacks (Emission points S-02-01, S-02-02, S-02-03, S-03N-01, S-03N-02, S-03N-03) shall be limited to the following:

Emission Point ID	Pollutant	Maximum Allowable Emissions (lbs/hr)	Maximum Allowable Emissions (TPY)
S-02-01 S-02-02 S-02-03 S-03N-01 S-03N-02 S-03N-03	PM	12	38.5
	PM_{10}	6	19.25

[45CSR13, R13-1608, 4.1.9]

6.2. Monitoring Requirements

6.2.1. Opacity monitoring per Requirement 3.2.1. Weekly Method 22 checks shall be conducted for a minimum of 6 consecutive weeks for all the emission points listed in Emission Units Table 1.0 under Briquet Coolers and Dryers. If in compliance, then monthly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.1, then for this emission point monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission

requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer. **[45CSR§30-5.1.c and 45CSR13, R13-1608, 4.2.2]**

6.2.2. Each opacity evaluation observation per 45CSR§7A-2.1.a,b as per Requirement 3.2.1 shall be a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) without averaging of results, unless any one single reading is greater than the opacity limit for the emission unit, in which case the observation period shall be extended to a 60 minutes or until a violation of the emissions standard per 45CSR§7-3.2 has been documented (more than twenty (20) single opacity readings are in excess of 20% opacity, but less than 40% opacity, or any single reading is equal or in excess of 40% opacity); whichever is the shorter period. **[45CSR§30-5.1.c]**

6.3. Testing Requirements

6.3.1. Testing per Section 3.3 Requirements.

6.4. Recordkeeping Requirements

6.4.1. Compliance with the hourly maximum processing rates listed in Requirement 6.1.1 shall be calculated on the basis of a rolling 30-day average expressed in tons per hour based on the hours of production for any specific 30-day period. Compliance with the yearly maximum processing rates in Requirement 6.1.1. shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of material processed, in tons, at the end of each month for that month and the previous 11 months. **[45CSR13, R13-1608, 4.1.4]**

6.4.2. The following information shall be recorded and maintained in accordance with Condition 3.4.2 of this permit.

a. total weight of dry briquets produced by the facility on a daily basis (excluding weight of the solvent and packaging material);
b. hours of operation for Briquet Dryers and Briquet Coolers on a daily basis;
c. hourly dry packaged briquets processing rate calculated as per Requirement 6.4.1.
d. yearly dry packaged briquets processing rate calculated as per Requirement 6.4.1.

[45CSR13, R13-1608, 4.2.1]

6.4.3. Visible emission checks recordkeeping as per requirement 6.2.1.

6.5. Reporting Requirements

6.5.1. N/A

6.6. Compliance Plan

6.6.1. N/A

7.0 Solvent Treated Briquet Process Requirements

7.1. Limitations and Standards

7.1.1. Volatile organic compound (VOC) emissions from the following equipment or areas shall be contained, captured and vented to either the After Combustion Chamber (ACC), Emission Point 19A, or to the ACC Bypass Stack, Emission Point 19B.
#1 Weigh Conveyor
Transfer Conveyor
Spray Application
Take-Away Conveyor
#2 Weigh Conveyor
Product Out Feed Conveyor
Sump SMP-100
Packaging Surge Bin
[45CSR14, R14-0001, 4.1.1]

7.1.2. VOC emissions from the ACC Bypass Stack (Emission Point 19B, Stack S-04) shall not exceed 36.6 lb/hr. VOC emissions from the ACC (Emission Point 19A, Stack S-01-01) shall not exceed 2.82 lb/hr above the baseline VOC emissions present prior to venting solvent treated briquet (STB) process VOC emissions to the ACC.
[45CSR14, R14-0001, 4.1.2]

7.1.3. Total VOC emissions from all emission points or sources (including pumps, valves, flanges, etc.) associated with the STB production facility shall not exceed 83 TPY as determined by Requirement 7.4.1.
[45CSR14, R14-0001, 4.1.3]

7.1.4. VOC emissions from the sources listed in Requirement 7.1.1 shall be vented to the ACC at all times the ACC is operating above 1400°F. The ACC stack temperature shall be monitored continuously and shall be equipped with an alarm that indicates when the ACC stack temperature drops below 1400°F. If the alarm is tripped, the VOC emissions shall be vented to the ACC Bypass Stack and production of STB shall be in accordance with the rate specified in Requirement 7.1.6.b.
[45CSR14, R14-0001, 4.1.4]

7.1.5. The average solvent application temperature shall not exceed 50°F during any eight (8) hour shift in which solvent is being fed to the spray application system. Solvent application temperature shall be monitored and recorded hourly during each shift. If the spray application system is operated for less than eight (8) hours during the shift, only the actual hours of operation shall be considered in determining the average temperature.
[45CSR14, R14-0001, 4.1.5]

7.1.6. STB production shall be limited to the following hourly rates:

a. 20 tons per hour when the VOC emissions from the sources listed in Requirement 7.1.1 are vented to the ACC;

b. 13 tons per hour when the VOC emissions from the sources listed in Requirement 7.1.1 are vented to the ACC Bypass Stack.

[45CSR14, R14-0001, 4.1.6]

7.1.7. STB production shall not exceed 64,000 tons in any calendar year. Maximum allowable STB production will vary between 23,860 TPY and 64,000 TPY, depending on ACC availability, so the total VOC emissions from the STB process do not exceed the maximum rate specified in requirement 7.1.3. **[45CSR14, R14-0001, 4.1.7]**

7.1.8. The ACC shall provide a 95% destruction efficiency for the STB process emissions specified in Requirement 7.1.1.
[45CSR14, R14-0001, 4.1.8]

7.1.9. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 of R14-0001 (i.e. the ACC) and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary. **[45CSR§13-5.10 and 45CSR14, R14-0001, 4.1.9]**

7.1.10. The control devices in the Emission Units Table 1.0. for the STB process shall be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions. **[45CSR§30-12.7]**

7.1.11. The permittee shall inspect all control systems, specified in the Emission Units Table 1.0 for the STB process, weekly to ensure that they are operated and maintained in conformance with their designs. **[45CSR§30-5.1.c]**

7.2. Monitoring Requirements

7.2.1. The ACC stack temperature monitoring per Requirement 7.1.4.

7.2.2. Solvent application temperature monitoring per Requirement 7.1.5.

7.2.3. Visible emissions monitoring shall be performed per Requirement 3.2.1. Quarterly Method 22 checks shall be conducted for all the emission points and units listed in Emission Units Table 1.0 under Solvent Treated Briquet Production (except ACC Stack S-01-01, see requirement 5.2.4). For ACC Bypass Stack (S-04) visible emission checks shall be performed during periods when this stack is in use. Anytime when not in compliance with the opacity limit per 45CSR§7-3.1, then for this emission point monitoring shall revert to a weekly frequency requirement and begin the progressive monitoring cycle again as follows:

1. Weekly Method 22 checks shall be conducted for a minimum of 6 consecutive weeks for all the emission points and units listed in Emission Units Table 1.0 under Solvent Treated Briquet Production (except ACC Stack S-01-01, see requirement 5.2.4).

2. If in compliance, then monthly Method 22 checks shall be conducted for a minimum of 4 consecutive months.

3. If in compliance, then quarterly Method 22 checks shall be conducted.

A record of each visible emission check required above shall be maintained on site and shall be made available to the Director or his/her duly authorized representative upon request. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR§30-5.1.c]

7.2.4. Each opacity evaluation observation per 45CSR§ 7A-2.1.a, b as per Requirement 3.2.1 shall be a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) without averaging of results, unless any one single reading is greater than the opacity limit for the emission unit, in which case the observation period shall be extended to a 60 minutes or until a violation of the emissions standard per 45CSR§7-3.2 has been documented (more than twenty (20) single opacity readings are in excess of 20% opacity, but

less than 40% opacity, or any single reading is equal or in excess of 40% opacity); whichever is the shorter period.
[45CSR§30-5.1.c]

7.2.5. Compliance with the hourly VOC emission limits in Section 7.1.2 will be demonstrated by demonstrating compliance with the requirements of Sections 7.1.5 and 7.1.6.
[45CSR§30-5.1.c]

7.2.6. The permittee shall conduct weekly inspections of the two (2) STB fume dampers in order to verify that they are being operated in accordance with permit condition 7.1.4. A record of each inspection required above shall be maintained on site for a period of at least 5 years and shall be made available to the Director or his/her duly authorized representative upon request.
[45CSR§30-5.1.c]

7.2.7. The permittee shall maintain a flow sensing device in the STB fume ductwork between last flow control damper and the inlet to the ACC. This device shall indicate presence of flow on the control screen in the control room and shall alarm to notify operators when the flow to the ACC is not present in accordance with permit condition 7.1.4 (where the ACC is operating above 1400°F). In the event when the flow is not present corrective actions should be taken, and records should be created to document it. Such records shall be maintained on site for a period of at least 5 years and shall be made available to the Director or his/her duly authorized representative upon request.
[45CSR§30-5.1.c]

7.3. Testing Requirements

7.3.1. The permittee shall conduct stack testing on emission point 19A (ACC vent stack S-01-01). Such testing shall be conducted during briquet production both with and without venting of volatile organic compounds to the ACC from the spray application system, weigh conveyors, sump, product out feed conveyor, transfer conveyor, take-away conveyor, and packaging surge bin, for the purpose of establishing baseline emission. Such test shall be conducted once per Permit term within one year of the Permit issuance or renewal. In lieu of this test the permittee may conduct ACC stack testing as per Requirement 3.3.3. If compliance with more stringent VOC emission limit in Requirement 4.1.3 is demonstrated, then compliance with VOC limit for emission point 19A in 7.1.2 will be demonstrated.

The permittee shall submit a test protocol to the West Virginia Office of Air Quality (DAQ) not less than thirty (30) days prior to testing and shall notify the DAQ in writing of the date and time of stack testing not less than fifteen (15) days prior to such testing. Test methods 1, 2, 3, 4, and 25 or 25A (refer to Appendix A of 40 CFR 60) shall be utilized. The Director may require an equivalent method or approve such equivalent method if proposed by the permittee.
[45CSR§30-5.1.c]

7.3.2. Results from testing per Requirement 7.3.1 shall be submitted to the Director within sixty (60) days from the date of completion of said testing. The test shall demonstrate that the tested units can operate at the maximum processing rate specified in Requirement 7.1.6 in compliance with the emissions limits set forth in Requirements 7.1.2 and 7.1.3.
[45CSR§30-5.1.c]

7.3.3. At such reasonable time(s) as the Secretary may designate, in accordance with the provisions of Section 3.3. of this permit, the permittee shall conduct or have conducted test(s) to determine compliance with the emission limitations established in this permit and/or applicable regulations. **[45CSR14, R14-0001, 4.3.1]**

7.4. Recordkeeping Requirements

7.4.1. The permittee shall demonstrate compliance with the VOC emission limitation established under Requirement 7.1.3 by use of the VOC emission factors in accordance with Appendix A of Permit R14-0001 (Attached to the Title V Permit). The DAQ Director shall not be precluded from requiring or using alternative compliance verification methods including the use of standard tank loss equations, fugitive emissions factors, stack test results, or other similar methods.
[45CSR14, R14-0001, 4.2.1]

7.4.2. Records required under Requirements 7.1.5 and 7.1.6 shall be maintained on-site and be readily accessible to DAQ staff to demonstrate compliance with the conditions of this permit. Each record shall be certified by the plant manager to be true and accurate. The records shall be maintained for a minimum of five (5) years and be made available to the Director or his authorized representative upon request. **[45CSR§30-5.1.c]**

7.4.3. STB production shall be monitored and recorded during each shift to provide the tons of STB produced and hours of operation when VOC emissions are vented to the ACC or to the ACC Bypass Stack. **[45CSR§30-5.1.c]**

7.4.4. Compliance with the hourly maximum processing rates listed in Requirement 7.1.6. shall be calculated on the basis of a rolling 30-day average expressed in tons per hour based on the hours of operation as per Requirement 7.4.3 for any specific 30-day period. Compliance with the yearly maximum processing rate specified in Requirement 7.1.7 shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of material processed, in tons, at the end of each month for that month and the previous 11 months.
[45CSR§30-5.1.c]

7.4.5. Visible emission checks recordkeeping as per Requirement 7.2.3.

7.5. Reporting Requirements

7.5.1. The permittee shall submit a report to the DAQ following each calendar quarter providing the following information:

a. The results of the quarterly VOC emission factor calculations in accordance with Appendix A;
b. A report of any exceedences of the solvent application operating temperature limit established in Requirement 7.1.5. The date, shift, and average temperature shall be reported for all eight (8) hour shifts during which an exceedence of the temperature limit occurred. If there were no exceedences of the operating temperature limit, the report shall so state and shall indicate that hourly temperatures were recorded for all operating periods during the quarter; and
c. STB hourly production rates for both conditions when the emission sources specified in Requirement 7.1.1 were vented to the ACC and to the ACC Bypass Stack.

The report shall be submitted to the DAQ within thirty (30) days following the end of each calendar quarter.

[45CSR14, R14-0001, 4.2.2]

7.6. Compliance Plan

7.6.1. N/A

8.0 Minors Ingredients Batching System/Dry Storage and Briquet Handling Requirements

8.1. Limitations and Standards

8.1.1. Emissions of particulate matter from the starch, nitrate and borax mixing tanks (Source ID E-06-0F) shall be vented to the 99.5% efficiency wet scrubber (C-21). Emissions from the scrubber shall not exceed 0.2 lb/hr of PM (Emission Point S-23).
[45CSR13, R13-1608, 4.1.10]

8.1.2. The control devices in the Emission Units Table 1.0. for the Minors Ingredients Batching System, Dry Storage and Briquet Handling shall be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions.
[45CSR§30-5.1.c] *(Emission Points S-10, S-11, S-13, S-14, S-17)*

8.1.3. Emissions of particulate matter from the Briquet Handling Operations shall be limited to the following:

Emission Point ID	Description	Pollutant	Maximum Allowable Emissions (lbs/hr)
S-06	Briquet Dryer Discharge Conveyors	PM/ PM_{10}	30.4
S-07	Briquet Packaging Lines	PM/ PM_{10}	32.0
S-08	Finished Briquet Handling Lines	PM/ PM_{10}	32.0

[45CSR§7-4.1]

8.1.4. The briquet handling operations pertaining to the Packaging Scale Bin In -feed, which is identified as Emission Unit E-08-03H, shall be limited to the following limitations:

a. Emissions of particulate matter and particulate matter less than 10 micros (PM_{10}) from Emission Point S-35 shall not exceed 0.73 pounds per hour.

b. Visible emission from Emission Point S-35 shall not exceed 20% opacity.

c. There is no annual operational restriction or limitation for the Packing Scale Bin In -feed system.

Compliance with these streamlined visible emissions limit and the PM and PM_{10} limits will ensure compliance with 45CSR§§7-3.1 & 4.1.

[45CSR13, R13-1608, 4.1.13]

8.2. Monitoring Requirements

8.2.1. In order to demonstrate compliance with the emission limits specified in Requirement 8.1.1 the permittee shall daily monitor flow rate of the Wet Scrubber (C-21) when it is in operation and maintain it at or above 3 gpm during normal operations. An alarm, inspection, corrective actions (if necessary) and recordkeeping per Requirement 8.4.1 are triggered if flow rate drops below 3 gpm.
[45CSR§§30-5.1.c and 12.7]

8.2.2. **CAM monitoring requirement**. The permittee shall maintain a pressure gauge on all Fabric Filter Dust Collector for pressure drop observations. The permittee shall maintain records of the maintenance performed on each fabric filter and pressure gauges. These records shall include all maintenance work performed on each fabric filter including the frequency of bag/filter change outs. Records shall state the date and time of each fabric filter inspection, the inspection results, and corrective action taken, if any. Records shall be maintained on site as per Requirement 3.4.2. The differential pressure drop across each of the three fabric filters compartments (C-01, C-02 and C-03, Emission Points S-06, S-07 and S-08,) shall be monitored at least once daily. Records shall be kept on site with entries based on indicator gauge readings. The indicator gauges, mounted on each Fabric Filter Dust Collector compartment, shall be examined to ensure they are functioning properly. Minimum acceptable accuracy of pressure gauges is $\pm$ 2% of the full range. Readings should be averaged on a daily basis. A daily average pressure drop outside of the following range is considered an excursion:

Emission Point ID	Description	Control Device ID	CAM pressure drop range (in of H_2O)
S-06	Briquet Dryer Discharge Conveyors	C-01	2-10.5
S-07	Briquet Packaging Lines	C-02	1-5.5
S-08	Finished Briquet Handling Lines	C-03	2-12

If an excursion occurs, corrective action, if necessary, shall be taken as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and recordkeeping and reporting shall be initiated.
[45CSR§§30-5.1.c and 12.7, and 40C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2)]

8.2.3. Visible emissions monitoring for Dry Storage tanks or their control devices (if any) with exhaust stacks located outdoors (Emission Points S-10 through S-17) shall be performed per Requirement 3.2.1. Upon beginning of normal operations weekly Method 22 checks shall be conducted at the time of each tank loading/unloading operations for a minimum of 6 consecutive weeks for all the emission points listed above. If in compliance, then monthly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.7, then corrective actions shall be taken immediately, and monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR13, R13-1608, 4.2.2 and 45CSR§30-5.1.c]

8.2.4. Visible emissions monitoring for Minors Ingredients Batching System and Briquet Handling emission points or their control devices (if any) with exhaust stacks located outdoors (Emission Points S-06, S-07, S-08, S-22 and S-23) shall be performed per Requirement 3.2.1. Upon beginning of normal operations weekly Method 22 checks shall be conducted for a minimum of 6 consecutive weeks for all the emission points listed above. If in compliance, then monthly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.1, then monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR13, R13-1608, 4.2.2 and 45CSR§30-5.1.c]

8.2.5. Each opacity evaluation observation per 45CSR§7A-2.1.a,b (as per Requirement 3.2.1) for Emission Points listed in Requirement 8.2.4. shall be a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) without averaging of results, unless any one single reading is greater than the opacity limit for the emission unit, in which case the observation period shall be extended to a 60 minutes or until a violation of the emissions standard per 45CSR§7-3.2 has been documented. (more than twenty (20) single opacity readings are in excess of 20% opacity, but less than 40% opacity, or any single reading is equal or in excess of 40% opacity); whichever is the shorter period.
[45CSR§30-5.1.c]

8.2.6. Compliance with the particulate matter and visible emission requirements as set forth in condition 8.1.4, (*Emission Unit E-08-03H*) shall be determined by conducting daily Method 22-like visible emission checks. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40 C.F.R. Part 60, Appendix A, Method 22 or from the lecture portion of the 40 C.F.R. Part 60, Appendix A, Method 9 certification course.

The visible emission check shall be performed during periods of facility operation at least once per day during daylight hours and appropriate weather conditions for a sufficient time interval to determine if any visible emissions are present.

If visible emissions are present during these checks or at any other time, visible emissions evaluations in accordance with 45CSR§§7A-2.1.a and 2.1.b shall be conducted immediately. Such evaluations shall not be required if the visible emissions condition is corrected as expeditiously as possible and the cause and corrective measures taken are recorded. The 45CSR7A evaluations shall be conducted during periods of facility operation.

[45CSR§30-5.1.c, 45CSR§7A-2.1]

8.3. Testing Requirements

8.3.1. N/A

8.4. Recordkeeping Requirements

8.4.1. Keep records of the scrubber C-21 flow rate on daily basis when the scrubber is in operation, and also of date and time when flow rate drops below 3 gpm during normal operations, and of the inspection and corrective actions taken (if any) as per Requirement 8.2.1.
[45CSR§30-5.1.c]

8.4.2. Visible emission checks recordkeeping as per Requirements 8.2.3 and 8.2.4.

8.4.3. General Recordkeeping Requirements for 40 C.F.R. Part 64 (CAM)

(1) The differential pressure per Requirement 8.2.2 shall be recorded daily.

(2) The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

(3) Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review and does not conflict with other applicable recordkeeping requirements.

[45CSR§30-5.1.c and 40 C.F.R. §64.9(b)]

8.5. Reporting Requirements

8.5.1. Reserved.

8.5.2. General Reporting Requirements for 40 C.F.R. Part 64 (CAM)

(1) On and after the date specified in 40 C.F.R. §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. Part 64, the permittee shall submit monitoring reports to the Director in accordance with permit condition 3.5.6.

(2) A report for monitoring under 40 C.F.R. Part 64 shall include, at a minimum, the information required under permit condition 3.5.8 and the following information, as applicable:

(iv) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(v) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(vi) A description of the actions taken to implement a QIP (if required by 3.2.6) during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 C.F.R. §64.9(a) and 45CSR§30-5.1.c]

8.6. Compliance Plan

8.6.1. N/A

9.0 Wood, Char and Coal Piles, Raw Material Handling and Plant Roads Requirements

9.1. Limitations and Standards

9.1.1. The permittee shall inspect all fugitive dust control systems, specified in the Emission Units Table 1.0 for Emission Point S-09, weekly to ensure that they are operated and maintained in conformance with their designs.
[45CSR§30-5.1.c]

9.1.2. Good operating practices shall be implemented and when necessary dust suppressants shall be applied in relation to stockpiling and general material handling to prevent dust generation and atmospheric entrainment.
[45CSR§7-5.2]

9.2. Monitoring Requirements

9.2.1. Visible emissions monitoring as per Requirement 3.2.1. Weekly Method 22 checks shall be conducted for a minimum of 6 consecutive weeks for all emission points listed in Emission Units Table 1.0 under Wood, Char and Coal Piles, Raw Material Handling and Plant Roads (including visible fugitive dust emissions that leave the plant site boundaries). If in compliance, then monthly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.1, then for this emission point monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR13, R13-1608, 4.2.2 and 45CSR§30-5.1.c]

9.2.2. Each opacity evaluation observation per 45CSR§7A-2.1.a,b as per Requirement 3.2.1 shall be a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) without averaging of results, unless any one single reading is greater that the opacity limit for the emission unit, in which case the observation period shall be extended to a 60 minutes or until a violation of the emissions standard per 45CSR§7-3.2. has been documented (more than twenty (20) single opacity readings are in excess of 20% opacity, but less than 40% opacity, or any single reading is equal or in excess of 40% opacity); whichever is the shorter period.
[45CSR§30-5.1.c]

9.3. Testing Requirements

9.3.1. N/A

9.4. Recordkeeping Requirements

9.4.1. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility (piles, transfer points, paved and unpaved roads).
[45CSR§30-5.1.c]

9.4.2. The permittee shall maintain records of the results of weekly inspections of the systems to minimize fugitive emissions per Requirement 9.1.1. Records shall state the times the systems were inoperable, what corrective actions taken as a result of the weekly inspections and all scheduled and unscheduled maintenance procedures.
[45CSR§30-5.1.c]

9.4.3. Visible emission checks recordkeeping as per requirement 9.2.1.

9.5. Reporting Requirements

9.5.1. N/A

9.6. Compliance Plan

9.6.1. N/A

10.0 Waste Heat Boiler Requirements

10.1. Limitations and Standards

10.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.
[45CSR§2-3.1]

10.1.2. The visible emission standards set forth in section 3 of 45CSR2 shall apply at all times except in periods of start-ups, shutdowns and malfunctions. Where the Director believes that start-ups and shutdowns are excessive in duration and/or frequency, the Director may require an owner or operator to provide a written report demonstrating that such frequent start-ups and shutdowns are necessary.
[45CSR§2-9.1]

10.2. Monitoring Requirements

10.2.1. Weekly Method 22 checks shall be conducted for a minimum of 6 consecutive weeks for the Waste Heat Boiler. If in compliance, then monthly Method 22 checks shall be conducted for a minimum of 4 consecutive months. If in compliance, then quarterly Method 22 checks shall be conducted. These checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix A, Method 9 or Method 22, during periods of operation of emission sources that vent from the referenced emission point for a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 40 C.F.R. 60, Appendix A, Method 9 within seventy-two (72) hours of the first signs of visible emissions. A 40 C.F.R. 60, Appendix A, Method 9 evaluation shall not be required if the visible emission condition is corrected within seventy-two (72) hours after the visible emission and the sources are operating at normal conditions. Anytime when not in compliance with the opacity limit per 45CSR§2-3.1, then for this emission point monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again.

A record of each visible emission check required above shall be maintained on site for a period of no less than five (5) years and shall be made available to the Director or his/her duly authorized representative upon request. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.

[45CSR§30-5.1.c]

10.3. Testing Requirements

10.3.1. N/A

10.4. Recordkeeping Requirements

10.4.1. Visible emission checks recordkeeping as per requirement 10.2.1.

10.5. Reporting Requirements

10.5.1. N/A

10.6. Compliance Plan

10.6.1. N/A

11.0 Diesel Fire Pump and Emergency Generator Requirements

11.1. Limitations and Standards

11.1.1. The permittee is authorized to operate the Diesel Fire Pump FP-2 (Emission Point S-33) and the Emergency Generator E-0B-02 (Emission Point S-36) with following emission limits in accordance with all terms and conditions of the 45CSR13 G60-D Class II General Permit:

Source ID#	Nitrogen Oxides		Carbon Monoxide		Volatile Organic Compounds	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
FP-2	6.15	1.54	0.45	0.11	0.09	0.02
E-0B-02	0.06	0.01	0.16	0.01	0.06	0.01

[45CSR13, G60-C012 General Permit Registration, Emission Limitations and G60-D, 5.1.2]

11.1.2. The internal combustion engine powering the emergency generator (E-0B-02) must meet the requirements of 40 C.F.R. 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. 60 Subpart JJJJ for spark ignition engines. No further requirements apply for such engines under 40 C.F.R. 63 Subpart ZZZZ.

§60.4233 What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?

(e) Owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to this subpart for their stationary SI ICE. For owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 100 HP (except gasoline and rich burn engines that use LPG) manufactured prior to January 1, 2011 that were certified to the certification emission standards in 40 CFR part 1048 applicable to engines that are not severe duty engines, if such stationary SI ICE was certified to a carbon monoxide (CO) standard above the standard in Table 1 to this subpart, then the owners and operators may meet the CO certification (not field testing) standard for which the engine was certified.

Table 1 to Subpart JJJJ of Part 60—NO_X, CO, and VOC Emission Standards for Stationary Emergency Engines >25 HP

Engine type and fuel	Maximum engine power	Manufacture date	Emission standards[a]					
			g/HP-hr			ppmvd at 15% O_2		
			NO_X	CO	VOC[d]	NO_X	CO	VOC[d]
Emergency	HP≥130	1/1/2009	2.0	4.0	1.0	160	540	86

[a]Owners and operators of stationary non-certified SI engines may choose to comply with the emission standards in units of either g/HP-hr or ppmvd at 15 percent O_2.

[d]For purposes of this subpart, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

§60.4234 How long must I meet the emission standards if I am an owner or operator of a stationary SI internal combustion engine?

Owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in §60.4233 over the entire life of the engine.

§60.4243 What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?

(a) If you are an owner or operator of a stationary SI internal combustion engine that is manufactured after July 1, 2008, and must comply with the emission standards specified in §60.4233(a) through (c), you must comply by purchasing an engine certified to the emission standards in §60.4231(a) through (c), as applicable, for the same engine class and maximum engine power. In addition, you must meet one of the requirements specified in (a)(1) and (2) of this section.

(1) If you operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, you must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required if you are an owner or operator. You must also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply to you. If you adjust engine settings according to and consistent with the manufacturer's instructions, your stationary SI internal combustion engine will not be considered out of compliance.

(2) If you do not operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, your engine will be considered a non-certified engine, and you must demonstrate compliance according to (a)(2)(i) through (iii) of this section, as appropriate.

(ii) If you are an owner or operator of a stationary SI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test within 1 year of engine startup to demonstrate compliance.

(b) If you are an owner or operator of a stationary SI internal combustion engine and must comply with the emission standards specified in §60.4233(d) or (e), you must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) and (2) of this section.

(1) Purchasing an engine certified according to procedures specified in this subpart, for the same model year and demonstrating compliance according to one of the methods specified in paragraph (a) of this section.

(d) If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (d)(1) through (3) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (d)(1) through (3) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (d)(1) through (3) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary ICE in emergency situations.

(2) You may operate your emergency stationary ICE for the purpose specified in paragraph (d)(2)(i) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (d)(3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (d)(2).

(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (d)(2) of this section. Except as provided in paragraph (d)(3)(i) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

[45CSR34, 40 CFR 63 Subpart ZZZZ §63.6590(c)(1); 45CSR16, 40 CFR 60 Subpart JJJJ §§60.4233(e), 60.4234, 60.4243 (a)(1), (a)(2), (a)(2)(ii), (b)(1) and (d), and Table 1 to Subpart JJJJ of Part 60; 45CSR13, G60-C012 General Permit Registration & G60-D, 5.1.6]

11.1.3. The Diesel Fire Pump (FP-2) must meet the requirements of 40 C.F.R. 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. 60 Subpart IIII for compression ignition engines. No further requirements apply for such engines under 40 C.F.R. 63 Subpart ZZZZ.

§60.4205 What emission standards must I meet for emergency engines if I am an owner or operator of a stationary CI internal combustion engine?

(c) Owners and operators of fire pump engines with a displacement of less than 30 liters per cylinder must comply with the emission standards in table 4 to this subpart, for all pollutants.

Table 4 to Subpart IIII of Part 60—Emission Standards for Stationary Fire Pump Engines
[As stated in 40 CFR §§60.4202(d) and 60.4205(c), you must comply with the following emission standards for stationary fire pump engines]

Maximum engine power	Model year(s)	NMHC + NO_X	CO	PM
225≤KW<450 (300≤HP<600)	2008 and earlier	10.5 (7.8)	3.5 (2.6)	0.54 (0.40)

§60.4206 How long must I meet the emission standards if I am an owner or operator of a stationary CI internal combustion engine?

Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR §§60.4204 and 60.4205 over the entire life of the engine.

§60.4207 What fuel requirements must I meet if I am an owner or operator of a stationary CI internal combustion engine subject to this subpart?

(b) Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 1090.305 for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted.

§60.4211 What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?

(a) If you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under paragraph (g) of this section:

(1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;

(2) Change only those emission-related settings that are permitted by the manufacturer; and

(3) Meet the requirements of 40 CFR part 1068, as they apply to you.

(b) If you are an owner or operator of a CI fire pump engine that is manufactured prior to the model years in table 3 to this subpart and must comply with the emission standards specified in 40 CFR §60.4205(c), you must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) through (b)(5) of this section.

(1) Purchasing an engine certified to emission standards for the same model year and maximum engine power as described in 40 CFR 1039 and 1042, as applicable. The engine must be installed and configured according to the manufacturer's specifications.

(2) Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in this subpart and these methods must have been followed correctly.

(3) Keeping records of engine manufacturer data indicating compliance with the standards.

(4) Keeping records of control device vendor data indicating compliance with the standards.

(5) Conducting an initial performance test to demonstrate compliance with the emission standards according to the requirements specified in 40 CFR §60.4212, as applicable.

[45CSR34, 40 CFR 63 Subpart ZZZZ §63.6590(c)(1); 45CSR16, 40 CFR 60 Subpart IIII §§60.4205(c), 60.4206, 60.4207(b), 60.4211(a), (b) and Table 4 to Subpart IIII of Part 60; 45CSR13, G60-C012 General Permit Registration & G60-D, 5.1.6]

11.1.4. The permittee must relocate diesel engines E-0B-01 at least once per year to maintain the portable non-road engine status that exempts the diesel engines from 40 C.F.R. 63, Subpart ZZZZ.

[45CSR§30-12.7]

11.1.5. *Maximum Hourly Limitation.* The maximum hours of operation for any registered emergency generator listed in the General Permit Registration application shall not exceed 500 hours per year. Compliance with the Maximum Yearly Hourly Operation Limitation shall be determined using a twelve-month rolling total. A twelve-month rolling total shall mean the sum of the hours of operation at any given time during the previous twelve consecutive calendar months.
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.1.3]

11.1.6. The applicable emergency generator(s) shall be operated and maintained as follows:

a. In accordance with the manufacturer's recommendations and specifications or in accordance with a site specific maintenance plan; and,

b. In a manner consistent with good operating practices.

[45CSR13, G60-C012 General Permit Registration & G60-D, 5.1.4]

11.1.7. Requirements for Use of Catalytic Reduction Devices

a. Rich-burn engine(s) equipped with non-selective catalytic reduction (NSCR) air pollution control devices shall be fitted with a closed-loop, automatic air/fuel ratio controller to ensure emissions of regulated pollutants do not exceed the emission limit listed in the General Permit Registration for any engine/NSCR combination under varying load. The closed-loop, automatic air/fuel ratio controller shall control a fuel metering valve to ensure a fuel-rich mixture and a resultant exhaust oxygen content of less than or equal to 2%.

b. Lean-burn engine(s) equipped with selective catalytic reduction (SCR) air pollution control devices shall be fitted with a closed-loop automatic feedback controller to ensure emissions of regulated pollutants do not exceed the emission limit listed in the General Permit Registration for any engine/SCR

combination under varying load. The closed-loop automatic feedback controller shall provide proper and efficient operation of the engine, ammonia injection and SCR device, monitor emission levels downstream of the catalyst element and limit ammonia slip to less than 10 ppm_v

c. Lean-burn engine(s) equipped with oxidation catalyst air pollution control devices shall be fitted with a closed-loop automatic air/fuel ratio feedback controller to ensure emissions of regulated pollutants do not exceed the emission limit listed in the General Permit Registration for any engine/oxidation catalyst combination under varying load. The closed-loop, automatic air/fuel ratio controller shall control a fuel metering valve to ensure a lean-rich mixture.

d. For engine(s) equipped with a catalyst, the registrant shall monitor the temperature to the inlet of the catalyst and in accordance with manufacturer's specifications; a high temperature alarm shall shut off the engine before thermal deactivation of the catalyst occurs. If the engine shuts off due to high temperature, the registrant shall also check for thermal deactivation of the catalyst before normal operations are resumed.

e. The registrant shall follow a written operation and maintenance plan that provides the periodic and annual maintenance requirements.

[45CSR13, G60-C012 General Permit Registration & G60-D, 5.1.5]

11.1.8. The emission limitations specified in section 11.1.1 shall apply at all times except during periods of start-up and shut-down provided that the duration of these periods does not exceed 30 minutes per occurrence. The registrant shall operate the engine in a manner consistent with good air pollution control practices for minimizing emissions at all times, including periods of start-up and shut-down. The emissions from start-up and shut-down shall be included in the twelve (12) month rolling total of emissions. The registrant shall comply with all applicable start-up and shut-down requirements in accordance with 40 CFR Part 60, Subparts IIII, JJJJ and 40 CFR Part 63, Subpart ZZZZ.
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.1.7]

11.2. Monitoring Requirements

11.2.1. Catalytic Reduction Devices

a. The registrant shall regularly inspect, properly maintain and/or replace catalytic reduction devices and auxiliary air pollution control devices to ensure functional and effective operation of the engine's physical and operational design. The registrant shall ensure proper operation, maintenance and performance of catalytic reduction devices and auxiliary air pollution control devices by:

1. Maintaining proper operation of the automatic air/fuel ratio controller or automatic feedback controller.

2. Following the catalyst manufacturer emissions related operating and maintenance recommendations, or develop, implement, or follow a site-specific maintenance plan.

[45CSR13, G60-C012 General Permit Registration & G60-D, 5.2.1]

11.2.2. Pursuant to 40 CFR 60 Subpart IIII *Standards Of Performance for Stationary Compression Ignition Internal Combustion Engines*, Diesel Fire Pump FP-2 is subject to the following monitoring requirements given below:

§60.4209 What are the monitoring requirements if I am an owner or operator of a stationary CI internal combustion engine?

If you are an owner or operator, you must meet the monitoring requirements of this section. In addition, you must also meet the monitoring requirements specified in 40 CFR §60.4211.

(a) If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.

[45CSR16, 40 CFR 60 Subpart IIII §60.4209(a); 45CSR13, G60-C012 General Permit Registration & G60-D, 5.1.6]

11.2.3. Pursuant to 40 CFR 60 Subpart JJJJ *Standards Of Performance for Stationary Spark Ignition Internal Combustion Engines*, emergency generator E-0B-02 is subject to the following monitoring requirements given below:

§60.4237 What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?

(b) Starting on January 1, 2011, if the emergency stationary SI internal combustion engine that is greater than or equal to 130 HP and less than 500 HP that was built on or after January 1, 2011, does not meet the standards applicable to non-emergency engines, the owner or operator must install a non-resettable hour meter.

[45CSR16, 40 CFR 60 Subpart JJJJ §60.4237(b); 45CSR13, G60-C012 General Permit Registration & G60-D, 5.1.6]

11.3. Testing Requirements

11.3.1. Pursuant to 40 CFR 60 Subpart IIII *Standards Of Performance for Stationary Compression Ignition Internal Combustion Engines*, Diesel Fire Pump FP-2 is subject to the following compliance and testing requirements given below:

§60.4211 What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?

(g) If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

(2) If you are an owner or operator of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

§60.4212 What test methods and other procedures must I use if I am an owner or operator of a stationary CI internal combustion engine with a displacement of less than 30 liters per cylinder?

Owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests pursuant to this subpart must do so according to paragraphs (a) through (e) of this section.

(a) The performance test must be conducted according to the in-use testing procedures in 40 CFR part 1039, subpart F, for stationary CI ICE with a displacement of less than 10 liters per cylinder, and according to 40 CFR part 1042, subpart F, for stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder. Alternatively, stationary CI ICE that are complying with Tier 2 or Tier 3 emission standards as described in 40 CFR part 1039, appendix I, or with Tier 2 emission standards as described in 40 CFR part 1042, appendix I, may follow the testing procedures specified in §60.4213, as appropriate.

(b) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1039 must not exceed the not-to-exceed (NTE) standards for the same model year and maximum engine power as required in 40 CFR 1039.101(e) and 40 CFR 1039.102(g)(1), except as specified in 40 CFR 1039.104(d). This requirement starts when NTE requirements take effect for nonroad diesel engines under 40 CFR part 1039.

(c) Exhaust emissions from stationary CI ICE subject to Tier 2 or Tier 3 emission standards as described in 40 CFR part 1039, appendix I, or with Tier 2 emission standards as described in 40 CFR part 1042, appendix I, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \cdot (\text{STD}) \quad \text{(Eq. 1)}$$

Where:

STD = The standard specified for that pollutant in 40 CFR part 1039 or 1042, as applicable.

(d) Exhaust emissions from stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in §60.4204(a), §60.4205(a), or §60.4205(c), determined from the equation in paragraph (c) of this section.

Where:

STD = The standard specified for that pollutant in §60.4204(a), §60.4205(a), or §60.4205(c).

Alternatively, stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) may follow the testing procedures specified in §60.4213, as appropriate.

(e) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1042 must not exceed the NTE standards for the same model year and maximum engine power as required in 40 CFR 1042.101(c).

[45CSR16, 40 CFR 60 Subpart IIII §§60.4211(g)(2) and 60.4212; 45CSR13, G60-C012 General Permit Registration & G60-D, 5.4.1]

11.3.2. Pursuant to 40 CFR 60 Subpart JJJJ *Standards Of Performance for Stationary Spark Ignition Internal Combustion Engines*, emergency generator E-0B-02 is subject to the following testing requirements given below:

§60.4243 What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?

(e) Owners and operators of stationary SI natural gas fired engines may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of §60.4233.

[45CSR16, 40 CFR 60 Subpart JJJJ §60.4243(e); 45CSR13, G60-C012 General Permit Registration & G60-D, 5.4.1]

11.3.3. To demonstrate compliance with general permit section 5.1.5(a) (requirement 11.1.7.a), the registrant shall verify that the closed-loop, automatic air/fuel ratio controller shall control a fuel metering valve to ensure a fuel-rich mixture and a resultant exhaust oxygen content of less than or equal to 2% during any performance testing.
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.4.2]

11.4. Recordkeeping Requirements

11.4.1. To demonstrate compliance with condition 11.1.5, the registrant shall maintain records of the hours of operation of the emergency generator(s) on a monthly basis.
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.3.1]

11.4.2. To demonstrate compliance with section 11.1.6, the registrant shall maintain records of the maintenance performed on each emergency generator.
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.3.2]

11.4.3. To demonstrate compliance with requirement 11.2.1, the registrant shall maintain a copy of the site specific maintenance plan or manufacturer maintenance plan.
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.3.3]

11.4.4. Pursuant to 40 CFR 60 Subpart JJJJ *Standards Of Performance for Stationary Spark Ignition Internal Combustion Engines*, emergency generator E-0B-02 is subject to the following recordkeeping requirements given below:

§60.4245 What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?

Owners or operators of stationary SI ICE must meet the following notification, reporting and recordkeeping requirements.

(a) Owners and operators of all stationary SI ICE must keep records of the information in paragraphs (a)(1) through (4) of this section.

(1) All notifications submitted to comply with this subpart and all documentation supporting any notification.

(2) Maintenance conducted on the engine.

(3) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 1048, 1054, and 1060, as applicable.

(4) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards.

(b) For all stationary SI emergency ICE greater than or equal to 130 HP and less than 500 HP manufactured on or after July 1, 2011 that do not meet the standards applicable to non-emergency engines, the owner or operator of must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

[45CSR16, 40 CFR 60 Subpart JJJJ §§60.4245(a), (b); 45CSR13, G60-C012 General Permit Registration & G60-D, 5.3.4]

11.4.5. To demonstrate compliance with section 11.1.4. of this permit, the permittee shall maintain records documenting that engines E-0B-01 were relocated at the Kingsford Manufacturing Company Parsons Plant site at least once every twelve months. An example record could be a dated photograph taken in front of the engine showing the UTM or longitude/latitude coordinates of the equipment location.
[45CSR§30-12.7]

11.4.6. All records required by this section shall be maintained in accordance with section 3.5.1 of the general permit (requirement 3.4.2).
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.3.5]

11.5. Reporting Requirements

11.5.1. Pursuant to 40 CFR 60 Subpart JJJJ *Standards Of Performance for Stationary Spark Ignition Internal Combustion Engines*, emergency generator E-0B-02 is subject to the following reporting requirements given below:

§60.4245 What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?

(e) If you own or operate an emergency stationary SI ICE with a maximum engine power more than 100 HP that operates for the purpose specified in §60.4243(d)(3)(i), you must submit an annual report according to the requirements in paragraphs (e)(1) through (3) of this section.

(1) The report must contain the following information:

(i) Company name and address where the engine is located.

(ii) Date of the report and beginning and ending dates of the reporting period.

(iii) Engine site rating and model year.

(iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.

(vii) Hours spent for operation for the purposes specified in §60.4243(d)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in §60.4243(d)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

(2) The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

(3) The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (*https://cdx.epa.gov/*). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in §60.4. Beginning on February 26, 2025, submit annual report electronically according to 40 C.F.R. §60.4245(g).

[45CSR16, 40 CFR 60 Subpart JJJJ §60.4245(e); 45CSR13, G60-C012 General Permit Registration & G60-D, 5.5.1]

11.6. Compliance Plan

11.6.1. N/A

12.0 40 C.F.R. 63 Subpart CCCCCC Requirements for Storage Tank E-0A-01

12.1. Limitations and Standards

12.1.1. **§ 63.11111 Am I subject to the requirements in this subpart?**

(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.

(b) If your GDF has a monthly throughput of less than 10,000 gallons of gasoline, you must comply with the requirements in 40 CFR § 63.11116.

(h) Monthly throughput is the total volume of gasoline loaded into, or dispensed from, all the gasoline storage tanks located at a single affected GDF. If an area source has two or more GDF at separate locations within the area source, each GDF is treated as a separate affected source.

(i) If your affected source's throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold.

(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 40 CFR § 63.11116 of this subpart.

§ 63.11112 What parts of my affected source does this subpart cover?

(a) The emission sources to which this subpart applies are gasoline storage tanks and associated equipment components in vapor or liquid gasoline service at new, reconstructed, or existing GDF that meet the criteria specified in 40 CFR § 63.11111. Pressure/Vacuum vents on gasoline storage tanks and the equipment necessary to unload product from cargo tanks into the storage tanks at GDF are covered emission sources. The equipment used for the refueling of motor vehicles is not covered by this subpart.

(b) An affected source is a new affected source if you commenced construction on the affected source after November 9, 2006, and you meet the applicability criteria in 40 CFR § 63.11111 at the time you commenced operation.

§ 63.11113 When do I have to comply with this subpart?

(a) If you have a new or reconstructed affected source, you must comply with this subpart according to paragraph (a)(2) of this section, except as specified in paragraph (d) of this section

> (2) If you start up your affected source after January 10, 2008, you must comply with the standards in this subpart upon startup of your affected source.

§ 63.11115 What are my general duties to minimize emissions?

Each owner or operator of an affected source under this subpart must comply with the requirements of paragraphs (a) and (b) of this section.

(a) You must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control

practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(b) You must keep applicable records and submit reports as specified in 40 CFR § 63.11125(d) and § 63.11126(b).

§ 63.11116 Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline.

(a) You must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

(1) Minimize gasoline spills;

(2) Clean up spills as expeditiously as practicable;

(3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;

(4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

(b) You are not required to submit notifications or reports as specified in 40 CFR § 63.11125, § 63.11126, or subpart A of this part, but you must have records available within 24 hours of a request by the Administrator to document your gasoline throughput.

(c) You must comply with the requirements of this subpart by the applicable dates specified in 40 CFR § 63.11113.

(d) Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with paragraph (a)(3) of this section.

[45CSR34; 40CFR63 Subpart CCCCCC §63.11111(a), (b), (h), (i), (j); §63.11112(a) and (b); §63.11113(a)(2); §63.11115; §63.11116]

12.2. Monitoring Requirements

12.2.1. None.

12.3. Testing Requirements

12.3.1. None.

12.4. Recordkeeping Requirements

12.4.1. **§63.11111 Am I subject to the requirements in this subpart?**

(e) An affected source shall, upon request by the Administrator, demonstrate that their monthly throughput is less than the 10,000-gallon threshold level, as applicable. For new affected sources, as specified in 40 CFR

§ 63.11112(b), recordkeeping to document monthly throughput must begin upon startup of the affected source.

§ 63.11125 What are my recordkeeping requirements?

(d) Each owner or operator of an affected source under this subpart shall keep records as specified in paragraphs (d)(1) and (2) of this section.

(1) Records of the occurrence and duration of each malfunction of operation (*i.e.,* process equipment) or the air pollution control and monitoring equipment.

(2) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR § 63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[45CSR34; 40CFR63 Subpart CCCCCC §63.11111(e); §63.11125(d)]

12.5. Reporting Requirements

12.5.1. None.

12.6. Compliance Plan

12.6.1. N/A

Appendix A of Permit R14-0001E

SOLVENT TREATED BRIQUET (STB)
VOC EMISSION FACTOR TECHNIQUE

The following VOC emission factor procedure shall be used as a method to estimate total VOC emissions for compliance verification.

VOC emissions depend on the total production of STB with and without the ACC in operation. The daily log sheets for the quarter will be used to determine the following three (3) quantities:

STB quarterly production in tons with the ACC controlling VOC emissions, (X).

STB quarterly production in tons with the ACC bypassed, (Y).

STB quarterly rework product in tons reprocessed, (Z).

VOC emissions consist of the following four (4) components:

1. **STB Fume Exhaust** - VOC emissions (tons) are calculated using the following equation:

   A = [(X)(0.196) lb VOC/ton STB) + (Y)(3.92 lb VOC/ton STB)]/(2,000)

2. **STB Briquet Fines** - VOC emissions (tons) are calculated using the following equation:

   B = [(X + Y)/27,000] x (27.2 tons VOC)

3. **STB Fixed Emissions** - Quarterly VOC emissions from solvent handling equipment and solvent storage tanks will be one fourth of the annual VOC emission rate:

   C = (12.2 TPY VOC)/4 = 3.05 tons VOC

4. **Rework of STB Product** - VOC emissions (tons) from reprocessing reworked STB product and calculated using the following equation:

   D = [(Z) x (250 lb VOC/ton STB)] / 2,000

Total Quarterly VOC Emissions = A + B + C + D

The above VOC calculations shall be performed quarterly and these quarterly estimates along with the input parameters, X, Y, and Z shall be submitted to the WVDAQ in accordance with Condition 7.5.1 of this permit. The records shall be maintained at the plant for a minimum period of two years.

West Virginia Department of Environmental Protection
Division of Air Quality

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**

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.

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^3 lignite storage tank. From the lignite storage tank, the lignite will be pneumatically conveyed to the lignite 295 ft^3 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

Plantwide Emissions Summary [Tons per Year]

Regulated Pollutants	Potential Emissions	2023 Actual Emissions
Carbon Monoxide (CO)	22.60	13.08
Nitrogen Oxides (NO_X)	250.79	113.33
Particulate Matter ($PM_{2.5}$)	115.42	91.85
Particulate Matter (PM_{10})	192.38	131.96
Total Particulate Matter (TSP)	271.31	196.39
Sulfur Dioxide (SO_2)	64.94	10.86
Volatile Organic Compounds (VOC)	91.62	48.91

PM_{10} is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2023 Actual Emissions
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_{10}. 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) (14)	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 *(if any)*
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^3 lignite bulk storage tank (Emission Unit E-06-10, Emission Point S-39) and a 295 ft^3 (8.36 m^3) 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 90% 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:

   - 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 underlined 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.
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.

Requirement	Regulatory Citation	Basis for Non-Applicability
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_2 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^3) and construction date (see **40CFR60 Subpart Kb Applicability Table** 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
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.

Requirement	Regulatory Citation	Basis for Non-Applicability
Boiler NESHAP	40 CFR 63 Subpart JJJJJJ	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 JJJJJJ.

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: (Date of Notice Publication)
Ending Date: (Publication Date PLUS 30 Days)

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 57th 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.

Received
December 15, 2023
WV DEP/Div of Air Quality

Division of Air Quality Permit Application Submittal

Please find attached a permit application for : Kingsford Manufacturing Company; Parsons, WV
[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only): 093-00004
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only): R13-1608M/R14-0001E/R30-09300004-2019 (MM02)

- Type of NSR Application (check all that apply):
  - ☐ Construction
  - ☐ Modification
  - ☐ Class I Administrative Update
  - ☐ Class II Administrative Update
  - ☐ Relocation
  - ☐ Temporary
  - ☐ Permit Determination

- Type of 45CSR30 (TITLE V) Revision (if any)**:
  - ☐ Title V Initial
  - ☑ Title V Renewal
  - ☐ Administrative Update
  - ☐ Minor Modification
  - ☐ Significant Modification
  - ☐ Off Permit Change

If any box above is checked, include the Title V revision information as ATTACHMENT S to this application.

- Payment Type:
  - ☑ Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
  - ☐ Check (Make checks payable to: WVDEP – Division of Air Quality)
    Mail checks to:
    WVDEP – DAQ – Permitting
    Attn: NSR Permitting Secretary
    601 57th Street, SE
    Charleston, WV 25304

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

- If the permit writer has any questions, please contact (all that apply):
  - ☐ Responsible Official/Authorized Representative
    - Name: Robert Boggs
    - Email: bobby.boggs@clorox.com
    - Phone Number: 304-478-5530
  - ☑ Company Contact
    - Name: Eric Copenhaver
    - Email: eric.copenhaver@clorox.com
    - Phone Number: 304-478-5559
  - ☑ Consultant
    - Name: Michael Zeiders
    - Email: mzeders@libertyenviro.com
    - Phone Number: 610-375-9301

THE CLOROX COMPANY

December 12, 2023

Ms. Laura M. Crowder
Director
West Virginia Department of Environmental Protection
Division of Air Quality
601 - 57th Street SE
Charleston, WV 25304

Kingsford Mfg. Company
WV Operations

Re: Title V Operating Permit Renewal Application for the Kingsford Manufacturing Co. Parsons, WV Charcoal Briquet Manufacturing Plant
Permit No. R30-09300004-2019

Dear Ms. Crowder:

Kingsford Manufacturing Company (KMC) operates a charcoal briquet manufacturing facility located in Parsons, West Virginia. KMC is submitting the enclosed Title V renewal application for the Parsons facility. This application is being submitted six months prior to the Title V permit expiration date of June 18, 2024. KMC believes that the enclosed submittal provides all the information required by the WV DAQ for technical review of the Title V renewal. As such, KMC believes that this submittal constitutes an administratively complete and timely Title V renewal application.

We are attaching one (1) PDF copy of the application that been signed by a responsible official. KMC understands that no application fee is required and that WV DAQ will address the public and affected state notification requirements.

If you have any questions regarding the enclosed Title V renewal application, please feel free to contact Mr. Eric Copenhaver, Plant Engineering Manager, at (304) 478-5559.

Very truly yours.

KINGSFORD MANUFACTURING COMPANY

R. J. Boggs

Robert Boggs
Plant Manager

Cc: Eric Copenhaver – KMC
Steve Waitman – Clorox
Gavin Biebuyck – Liberty Environmental

Title V Permit Renewal Application
Kingsford Manufacturing Company
Parsons, West Virginia Facility

Submitted to:

State of West Virginia
Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

Prepared by:

Liberty Environmental, Inc.
505 Penn Street, Suite 400
Reading, PA 19601

DECEMBER 2023

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1. INTRODUCTION

1.1 OVERVIEW

Kingsford Manufacturing Company (KMC) operates a charcoal briquet manufacturing facility in Parsons, Tucker County, West Virginia. Char is produced from bark/wood material and is used as an ingredient in the production of charcoal briquets. The Parsons facility is subject to Title V air permitting requirements because potential emissions of particulate matter (PM), PM_{10}, $PM_{2.5}$, and nitrogen oxides (NO_x) exceed 100 tons per year (tpy). KMC submitted an initial Title V operating permit application in 1996. KMC was issued an initial Title V permit in June 2003. The Title V permit was subsequently been renewed as required and the Parsons facility currently operates under Permit No. R30-09300004-2019 that was issued on June 18, 2019 and expires on June 18, 2024. This Title V permit renewal application is being submitted six (6) months prior to expiration date of the permit. The application addresses facility changes that have occurred since 2019 and addresses new regulatory requirements.

The changes to the facility include: (1) modifications to existing char handling operations (Administrative Update R13-1608K, Minor Modification 01 4/21/2020); (2) installation of sawdust additive system to the existing minor ingredients batching system/dry storage operations (Notice of Intent to Install 08/21/2020), (3) modifications to modify existing char handling operations (Administrative Update R13-1608L, Minor Modification 02 11/29/2022), (4) modifications to modify existing material handling and briquet manufacturing operation (R13-1608M 7/10/2023, R14-001E 8/14/2023). Kingsford is requesting that the provisions of R13-1608M and R14-0001E) be included in this permit. The sawdust system is a closed system involving totes and does not require inclusion in the permit. Section 2 of this report provides a process description for the facility and summarizes facility changes that have occurred since 2019.

Section 3 of this report provides a facility-wide air emission inventory summarizing plant-wide emissions. Supporting emissions calculations are provided in Appendix B.

Section 4 of this report addresses the applicability of federal NESHAP and NSPS standards.

The WVDEP application forms are provided in Appendix A.

1.2 REPORT ORGANIZATION

This report has been prepared to provide WVDEP with the necessary information to renew KMC's Title V Operating Permit. The WVDEP permit application forms are provided in Appendix A of this report. The report consists of the following sections and appendices:

Section 1 – Introduction provides an overview of the renewal and the report organization.

Section 2 – Process Description describes current facility operations including changes to the plant that have occurred since 2019.

Section 3 – Emission Inventory summarizes criteria air pollutant potential emissions estimates for the facility, provides background documentation for the current emission estimates, and provides greenhouse gas (GHG) and fine particulate matter ($PM_{2.5)}$ potential emissions estimates.

Section 4 – Applicable Requirements summarizes new potentially applicable federal and WVDEP air quality requirements, provides an updated Permit Shield request, and proposes revisions to the current Title V permit.

Appendix A – WVDEP Application Forms includes applicable WVDEP air quality application forms.

Appendix B – Facility Emissions provides detailed potential emissions calculations for the Parsons facility.

2. PROCESS DESCRIPTION

2.1 FACILITY OPERATIONS

The KMC Parsons plant is located in Tucker County, West Virginia along WV Route 219. The location of the facility is shown in the WVDEP application forms (Appendix A, Attachment A).

KMC manufactures and packages Kingsford® brand charcoal briquets in several bag sizes at the Parsons plant. The plant receives wood, which is processed in a wood dryer and retort furnace to produce char. Char is also transported to the Parsons plant from the KMC Beryl, WV plant. The char is mixed with other additives including a starch binder and pressed into briquets. The briquets are then dried in two briquet dryers, cooled, and then stored in silos prior to bagging and packaging. The plant also operates a solvent treated briquet operation to produce the MatchLight® brand products.

The Parsons plant is classified as a major source of NO_x and PM emissions and therefore submitted a Title V application addressing all applicable state and federal air quality requirements in 1996. KMC was issued an initial Title V permit in June 2003, #R30-09300004-2003. The Title V permit was subsequently renewed as required and the Parsons facility currently operates under Permit No. R30-09300004-2019 that was issued on June 18, 2019 and expires on June 18, 2024. Several permit modifications have been made since 2019 and are summarized in the remainder of this section. The WVDEP application forms (Appendix A, Attachment D) list the plant emitting units that are defined in the current Title V permit. The table lists the emitting units, and their associated sources, control devices, and stacks.

2.2 PLANT MODIFICATIONS DURING PERMIT TERM

2.2.1 Material Handling Modifications - 2019

The KMC Parsons, WV plant historically mechanically conveyed/transferred the “retort char” produced in the “wood drying and charring system” (E-03-01) through two (2) retort char transfer bins (E-06-05) each with particulate matter (PM) controlled by a bin vent filter (C-38). The char is then pneumatically conveyed to a receiver tank controlled by a fabric filter (C-11) and then mechanically via screw conveyor and bucket elevator to char storage tanks. The char

that is produced in the retort furnace is quenched with water prior to being mechanically transferred to the char transfer bins. KMC encountered problems with the wet (15-20% moisture) char blinding the two bin vent filters (C-38), resulting in increased maintenance requirements. KMC replaced the two fabric filters (C-38) with a single venturi scrubber more suited for handling wet material (C-38). These modifications were addressed through Administrative Update R13-1608K (11/6/2019) and were incorporated into the Title V Operating permit via a Minor Modification (MM01, 01 4/21/2020)

2.2.2 Sawdust Additive System - 2020

KMC installed a sawdust additive system to the existing minor ingredients batching system/dry storage operations (EU06). The system allows addition of kiln-dried sawdust via super sacks to the char prior to it being added to the briquet mixing operations (Muller Vent EU-06-0E).

The sawdust additive system allows the addition of dry sawdust to the char blending system prior to addition of the char to the briquet mix. The sawdust additive system is located at the outlet of the existing char storage silos (EU06-02, 03, 04 and 05) and prior to the mixing operations (EU-06-05). The sawdust is brought onsite in 1-ton super sacks and then is screw conveyed into the char chute at the outlet of the silos. It is then conveyed through the existing char hammermill (EU-02-0C) to the mixing operations where it is mixed with other minor ingredients (e.g., starch, coal, lime, borax, etc.) already in use at the Parsons facility.

The super sacks and the screw conveyors are essentially sealed systems. Additionally, the sawdust is added to quenched (10-20% moisture) char prior to its being mixed with other ingredients and water in the mixing operation. Because of the enclosed nature of the operation and the moisture content of the materials, emissions from the sawdust additive operation are negligible. KMC adds the sawdust at 0-6% of the total briquet mix. This addition of sawdust does not have any effect on downstream sources (e.g., the briquet coolers, dryers and packaging operations). No changes are requested to the Title V Operating Permit.

2.2.3 Material Handling Operations - 2022

KMC modified the existing char handling operations by installing a “screw pump” system. KMC had transferred the “retort char” that is produced in the “wood drying and charring system”

(E-03-01) through two (2) retort char transfer bins (E-06-05) controlled by a single venturi scrubber (C-38). The char is then pneumatically conveyed to a receiver tank controlled by a fabric filter (C-11) and then mechanically via screw conveyor and bucket elevator to char storage tanks. The char that is produced in the retort furnace is quenched with water prior to being mechanically transferred to the char transfer bins.

KMC replaced a component of the retort char pneumatic transfer system (E-06-05). The system had included two (2) retort char transfer bins controlled by a venturi scrubber (C-38). The second bin transferred char to a pneumatic conveying system via two (2) double flap valves. The second bin and its double flap valves were replaced by a single duct followed by a screw pump. The venturi scrubber (C-38) associated with the first bin in the retort char transfer system remains in operation. These changes were addressed in Administrative Update R13-1608L and were incorporated into the Title V Permit via a Minor Modification (MM02) on 11/29/2022. No changes are requested to the Title V Operating Permit

2.2.4 Material Handling and Briquet Manufacturing Operations - 2023

KMC modified three (3) existing permitted emissions sources at the facility: Lime Use Tank (E-06-09); Char and Coal Truck Dumping (E-02-09); and, Solvent Treated Briquet (STB) Production (E-05-01). The lime use tank and char/coal truck dump systems were replaced, whereas the STB solvent application system was modified to reduce used solvent handling and to reduce volatile organic compound (VOC) emissions.

2.2.4.1 Lime Use Tank E-06-09

KMC had two (2) methods of receiving lime. The first is by pneumatic truck. The pneumatic truck system allows lime to be blown directly from the truck to the bulk lime tank (EU-06-06), controlled by a bin vent filter (C-12) and then pneumatically conveyed to the lime use tank (EU-06-09), controlled by a bin vent filter (C-15). The second method of receipt is by bulk truck. The bulk truck unloading system (EU-02-0E, added in 2015) consists of receiving lime from covered trucks that back into an existing “shed” (three-sided roofed enclosure), and dumping the lime onto an open pad. The lime is then transferred from the resulting pile into hoppers using a front-end loader. The limestone can then either be transferred via covered conveyor systems to the existing charcoal briquet mixing process operations or blown (similar to the pneumatic truck

receipt) from a hopper to the bulk lime tank (EU-06-06), controlled by a bin vent filter (C-12) and then pneumatically conveyed to the lime use tank (EU-06-09), controlled by a bin vent filter C-15).

KMC replaced the existing lime use bin fabric filter (C-15, Adaptive Engineering FRC-9X27, 600 cfm) with a new fabric filter of similar size (Schenck Process 39AVRC14, Style II, 560 cfm). The only other change to the existing equipment is that the lime use bin fabric filter's drop duct (drops collected dust into the manufacturing operations) chute was upsized from 26" to 40" to improve blow back. KMC is requesting that the Title V Operating Permit be revised to include the new specifications for C-15. Updated fabric filter specifications are included in Attachment G and updates to the equipment table are included in Attachment D.

2.2.4.2 Char and Coal Truck Dumping E-02-09

KMC currently can receive char and coal via an existing hydraulically elevated truck dumping station (E-02-09) controlled by a wet scrubber (C-34). KMC plans to replace the existing truck dumping station with a new dumping station. The new dumping station will be essentially the same as the existing truck dumping station but will be equipped with a receiving bin that will allow drivers to dump their own trucks. The new truck dump will be in the same location as the existing truck dump and will be controlled by the existing wet scrubber (C-34). Updated modification dates are provided in Attachment D.

2.2.4.3 Solvent Treated Briquet Production E-05-01

KMC has modified the solvent application system on the STB production line to improve the precision with which the solvent is applied to the charcoal briquet and thereby eliminate the need to filter and recycle excess solvent to remove briquet fines. The old application system consisted of a curtain coater that only exposed the briquets to solvent for a few seconds. This has been removed and replaced with a spray application system that should provide 45-60 seconds for the briquets to absorb solvent. The dry briquets enter an enclosed 20" diameter cylindrical vertical hopper where solvent is sprayed on them as they pass through the hopper. The depth of the briquets in the hopper is approximately 5'. The briquet hopper itself is taller to accommodate the infeed and solvent spray nozzles. New conveyors convey the briquets into and out of the application hopper. New weigh belts (inlet and outlet) are used to determine briquet solvent

content and the solvent spray will be adjusted to achieve the desired solvent content. It is planned that only the necessary amount of solvent will be applied with no free solvent making it through the system and requiring filtration/recycling. The changes to the solvent application system do not increase the hourly capacity of the system and is expected to reduce VOC emissions on a "lb VOC/ton briquet" basis.

Solvent fumes from the enclosed solvent spray application are captured with the existing solvent application fume collection system and are ducted to the after combustion chamber (ACC), control device (C-08), for VOC abatement. Solvent evaporative losses associated with the solvent application process are minimized through the use of the existing solvent chiller that maintains the solvent temperature below 50 degrees F on an 8-hour average basis. No changes to the existing solvent storage tanks, solvent receiving piping, and solvent transfer pump or transfer piping are planned. Updated equipment information is provided in Attachment D and E.

2.2.5 Miscellaneous Changes

The 10,000 gasoline storage tank (E-0A-01) has been replaced with a 500 gallon tank.

2.3 REVISED INSIGNIFICANT ACTIVITIES LIST

A revised insignificant activities checklist list is attached with the WVDEP application forms (Attachment A – General Forms). This table lists the current types of insignificant sources in operation at the facility and reflects the modifications to the plant that have taken place since 2019.

3. EMISSION INVENTORY

3.1 FACILITY-WIDE EMISSIONS

Table 3-1 summarizes potential emission rates from the Parsons facility. Supporting emissions calculations are provided in Appendix B. The table demonstrates that the facility is a major source of PM, PM_{10}, $PM_{2.5}$, and NO_x emissions because potential emission rates exceed 100 tons per year (tpy) based on maximum rated capacities and permit throughput restrictions.

TABLE 3-1
POTENTIAL FACILITY EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WV

Source	Potential Annual Emissions (tons/yr)										
	NO_x	CO	VOC	SO_2	PM	PM_{10}	$PM_{2.5}$	Methanol	Lead	Total HAPs	Non-Biogenic CO_2e
Wood & Char Piles (E-01)					15.00	7.05	1.05		5.25E-05	5.25E-05	
Raw Material Handling (E-02)					0.71	0.34	0.05		2.97E-06	2.97E-06	
Charring & Briquet Dryers (E-03)	237.50	13.31	6.65	64.60	175.78	129.07	66.97	3.70	1.36E-02	3.71E+00	5722.68
Briquet Coolers (E-04)					38.50	19.25	11.55		6.43E-04	6.43E-04	
Solvent Treated Briquet Production (E-05)			83.00								
Minor Ingredient Batching/Dry Storage (E-06)					3.34	3.34	3.34		1.43E-05	1.43E-05	
Natural Gas Burning (E-07)	10.00	8.40	0.55	0.06	0.76	0.76	0.76		5.00E-05	5.00E-05	51,247.11
Briquet Handling (E-08)					29.47	29.47	29.47		4.92E-04	4.92E-04	
Plant Roads (E-09)					5.81	1.16	0.29				
Liquid Storage (E-10)			1.10								
Emergency Equipment (E-11)	3.29	0.89	0.32	0.28	0.27	0.27	0.27			5.50E-03	
Total	**250.79**	**22.60**	**91.62**	**64.94**	**269.63**	**190.71**	**113.75**	**3.70**	**1.48E-02**	**3.72**	**56,969.79**

Source	Operating Schedule (hr/yr)	Units	Maximum Annual Production (dry ton/yr)	Maximum Hourly Production (dry ton/hr)
ACC	8,760	Wood (dry)	209,000	38.5
		Wood (wet)	418,000	
Briquet Dryers	8,760	Dry Briquets	154,000	24

Potential to emit assumptions
Natural gas throughput - 200 MMcf/yr
Solvent treaded briquet (STB) production - 20 tph, 64,000 tpy
Baghouses - outlet grain loading 0.01 gr/scf, 8.760 hours/yr
Wood pile throughput - 500,000 tpy

4. APPLICABLE REQUIREMENTS

The following subsections contain an assessment of new federal and state air regulations that are potentially applicable to the Parsons plant operations. Applicable requirements are identified on the "Applicable Requirement" section of the WVDEP "Emission Unit Form" provided in Appendix A, Attachment E. The summary provided in Subsections 4.1 and 4.2 below is intended to supplement the application checklist and to provide the WVDEP with KMC's assessment of the non-applicability of various newly promulgated air regulations. Several revisions to the existing Parsons plant Title V permit conditions are requested in Subsection 4.3.

4.1 NEW FEDERAL REGULATIONS

The potential applicability of the following federal air quality regulations are discussed in this subsection:

- National Emissions Standards for Hazardous Air Pollutants (NESHAP)
- New Source Performance Standards (NSPS)
- Title V and Compliance Assurance Monitoring (CAM) Requirements

4.1.1 National Emission Standards for Hazardous Air Pollutants (NESHAP)

NESHAP promulgated prior to the 1990 Clean Air Act Amendments (CAAA) found in 40 CFR 61, applies to seven specific compounds emitted from specific sources. Pursuant to the CAAA of 1990, NESHAP specific to processes identified that emit an additional 188 air pollutants are promulgated in 40 CFR 63. There are currently no pollutant specific or process specific NESHAP promulgated or proposed which would specifically apply to charcoal manufacturing operations.

The KMC Parsons plant is a minor source of HAP and is therefore not subject to any of the major source NESHAP "MACT" standards. However, there are several area source NESHAP regulations that have the potential to apply to the KMC Parsons plant, including the Industrial, Commercial, and Institutional (ICI) Boiler NESHAP at 40 CFR 63 Subpart JJJJJJ, the Reciprocating Internal Combustion Engine (RICE) NESHAP at 40 CFR 63 Subpart ZZZZ and the Gasoline Distribution NESHAP (40 CFR 63 Subpart CCCCCC).

The ICI Boiler NESHAP was promulgated in March of 2011. The Parsons facility contains no sources affected by the regulations due to the fact that the boiler can only fire natural gas. Gas-fired boilers are not regulated by Subpart JJJJJJ. The rotary wood dryer, retort furnace and ACC are not classified as "process heaters" because they are not indirect heat exchangers and these sources are not regulated by Subpart JJJJJJ. The regulation therefore does not apply to the Parsons facility.

The RICE NESHAP affects stationary RICE sources including diesel or natural gas-fired emergency generators located at area sources of HAP emissions. The Parsons facility operates four (4) diesel-fired portable flood pump engines (E-0B-01). The Parsons facility also operates several small portable IC engines including portable welders. The portable engines do not meet the definition of "stationary RICE" and are therefore not subject to the RICE NESHAP.

However the RICE NESHAP is applicable to the natural gas-fired emergency generator (E-0B-02) and to the diesel fire pump (FP-2). Because these are new engines they are required to meet the NSPS requirements for IC engines (40 CFR 60 Subpart IIII for the diesel CI engine and 40 CFR 60 Subpart JJJJ for the natural gas SI engine). The NSPS requirements include use of engines capable of meeting the NSPS emissions standards, use of compliant fuels (ultra low sulfur diesel), and limitations on the hours of operation. All of these standards have already been incorporated into the permit.

The Gasoline Distribution NESHAP (40 CFR 63 Subpart CCCCCC) also applies to the Parsons facility. KMC operates a 500-gallon gasoline storage tank (E-0A-01) which is used to refill vehicles at the facility. Monthly gasoline throughput is less than 500 gallons.

4.1.2 New Source Performance Standards (NSPS)

The federal NSPS regulations are promulgated at 40 CFR Part 60. There are currently no process specific NSPS promulgated or proposed which would specifically apply to charcoal manufacturing operations. However there are NSPS regulations that may apply to individual types of operations within the Parson facility. These regulations are discussed below.

The waste heat boiler burner is rated at 7.83 million Btu/hr and fires natural gas. The boiler is therefore exempt from the NSPS Subpart Dc requirements for industrial boilers rated between 10-100 million Btu/hr.

The bulk solvent storage tanks consist of two (2) 15,000 gallon and three (3) 10,000 gallon tanks that are used to store solvent before use at the STB operation. The facility also operates assorted fuel and lubricant storage tanks with capacities less than or equal to 10,000 gallons. Due to the fact that KMC's storage tanks each have capacities less than 75 cubic meters (19,813 gallons), the tanks are not subject to the NSPS Subpart Kb requirements.

The Parsons facility's coal handling operations exceeded the Coal Preparation NSPS (40 CFR Subpart Y) applicability threshold of 200 tons per day in 2003. This action triggered the visible emissions standards for coal sizing and handling. KMC completed the initial performance testing for visible emissions on January 6, 2004 and demonstrated compliance with the Subpart Y standard.

As detailed in subsection 4.1.1, the RICE NSPS requirements at 40 CFR 60 Subpart IIII and JJJJ apply to the natural gas-fired emergency generator and to the diesel fire pump, respectively. These NSPS requirements have been incorporated into the Title V permit.

4.1.3 Title V and CAM Requirements

The federal Compliance Assurance Monitoring (CAM) Rule at 40 CFR Part 64 requires Title V sources to prepare CAM Plans for certain large sources employing air pollution control devices. CAM Plans must identify emissions monitoring or equipment parametric monitoring procedures that will provide compliance assurance for affected control devices. The CAM Rule applicability provisions (40 CFR 64.2) specify that CAM-applicability must be assessed on a pollutant-by-pollutant basis and that affected sources are determined based on the following criteria: (1) the source must be equipped with a control device for the pollutant; (2) the source must be subject to an emission limitation for the pollutant; and, (3) potential emissions prior to control must exceed the major source threshold for the pollutant.

The deadline for submission of the CAM Plans is set forth in 40 CFR 64.5. This regulation states that sources to which the CAM requirements are applicable, which have complete Title V

applications by April 20, 1998, and which have post control emissions less than major source status may submit CAM plans at the time of the Title V operating permit renewal. The KMC Parsons plant submitted a complete and timely Title V application for existing operations in 1996 and therefore the deadline for CAM Plan submittal was June 2008 when the initial Title V permit was due for renewal. The KMC Parsons plant proposed CAM parametric monitoring requirements which have been incorporated into the current Title V permit for the After Combustion Chamber (C-08) that controls VOC and PM emissions from the rotary wood dryer and retort furnace (E-03-01) and the three (3) large fabric filter dust collectors (C-01, C-02, and C-03) that control PM emissions from the briquet handling operations (E-08).

KMC is providing Table H-1 as Attachment H to the permit application forms detailing CAM applicability to each of the control devices at the Parsons facility. KMC has addressed the potential applicability of CAM to the new Bulk Lime Tank fabric filter dust collector (C-15) and the Char Transfer Venturi Scrubber (C-38) that have been installed at the Parsons plant since the Title V permit was issued in 2019. CAM is not applicable to the Bulk Lime Tank bin vent filter because the filter is an integral component of the lime pneumatic transfer system and is therefore not primarily a "control device". The CAM Rule excludes devices that are primarily used for product recovery from the definition of "control device". CAM is not applicable to the venturi scrubber because pre-control emissions are less than 100 tpy.

4.2 NEW WEST VIRGINIA REGULATIONS

The WVDEP promulgated regulations at §45-1 allowing for the establishment of alternative emission limitations during startup, shutdown, or maintenance (SSM) activities. The current operation permit requires that the ACC combustion chamber maintain a minimum three-hour average temperature of 1,600 ˚F to demonstrate compliance, except during periods of system startup, shutdown, or maintenance (Condition 5.2.2). KMC believes the Parsons facility can comply with the WV opacity standards at §45-7 during periods of system startup based on the ACC burner capacity and standard operating practices that are employed during startups, and is therefore not requesting an alternative emission limit during SSM conditions under this new regulation.

4.3 REQUESTED REVISIONS TO TITLE V PERMIT

KMC is requesting several minor revisions to the current Title V permit conditions. The revisions to the current Title V permit conditions that are requested consist of the following:

- Add federal Gasoline Distribution NESHAP (40 CFR 63 Subpart CCCCCC) to list of applicable air quality requirements for the 500 gallon gasoline storage tank (E-0A-01). Monthly gasoline throughput is less than 500 gallons. KMC requests that the applicable requirements of Subpart CCCCCC be added to the permit including: (1) the requirement to track monthly gasoline throughput; (2) the requirement to operate and maintain the affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions; and, (3) the permitted must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:
    - (1) Minimize gasoline spills;
    - (2) Clean up spills as expeditiously as practicable;
    - (3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; (portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with this requirement)
    - (4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

APPENDIX A
WVDEP APPLICATION FORMS

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street SE

Charleston, WV 25304

Phone: (304) 926-0475

www.dep.wv.gov/daq

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

1. **Name of Applicant (As registered with the WV Secretary of State's Office):** Kingsford Manufacturing Company	**2. Facility Name or Location:** Parsons Plant Parsons, Tucker County, West Virginia
3. DAQ Plant ID No.: 093-00004	**4. Federal Employer ID No. (FEIN):** 943240524

5. **Permit Application Type:**

☐ Initial Permit — When did operations commence? MM/DD/YYYY

☒ Permit Renewal — What is the expiration date of the existing permit? 06/18/2024

☐ Update to Initial/Renewal Permit Application

6. Type of Business Entity:

☒ Corporation ☐ Governmental Agency ☐ LLC ☐ Partnership ☐ Limited Partnership

8. Number of onsite employees:

Approx. 100

7. Is the Applicant the:

☐ Owner ☐ Operator ☒ Both

If the Applicant is not both the owner and operator, please provide the name and address of the other party.

_____

_____

_____

9. Governmental Code:

☒ Privately owned and operated; 0

☐ Federally owned and operated; 1

☐ State government owned and operated; 2

☐ County government owned and operated; 3

☐ Municipality government owned and operated; 4

☐ District government owned and operated; 5

10. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☐ Yes ☒ No

If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's *"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"* guidance.

11. Mailing Address		
Street or P.O. Box: P.O. Box 464		
City: Parsons	**State:** WV	**Zip:** 26287-
Telephone Number: (304) 478-2911	**Fax Number:** (304) 478-2129	

12. Facility Location (Physical Address)		
Street: Route 219	**City:** Parsons	**County:** Tucker
UTM Easting: 613.20 km	**UTM Northing:** 4,326.20 km	**Zone:** ☒ 17 or ☐ 18
Directions: The facility is located on Route 219, about 2 miles South of Parsons.		
Portable Source? ☐ Yes ☐ No		
Is facility located within a nonattainment area? ☐ Yes ☒ No		**If yes, for what air pollutants?**
Is facility located within 50 miles of another state? ☒ Yes ☐ No		**If yes, name the affected state(s).** Maryland
Is facility located within 100 km of a Class I Area[1]? ☒ Yes ☐ No **If no, do emissions impact a Class I Area[1]?** ☐ Yes ☐ No		**If yes, name the area(s).** Dolly Sods Otter Creek

[1] *Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.*

13. Contact Information		
Responsible Official: Robert Boggs		**Title:** Plant Manager
Street or P.O. Box: P.O. Box 464		
City: Parsons	**State:** WV	**Zip:** 26287-
Telephone Number: (304) 478-2911	**Cell Number:** ( ) -	
E-mail address: bobby.boggs@clorox.com		
Environmental Contact: Eric Copenhaver		**Title:** Plant Engineering Manager
Street or P.O. Box: P.O. Box 464 Parsons		
City: Parsons	**State:** WV	**Zip:** 26287-
Telephone Number: (304) 478-2911	**Cell Number:** ( ) -	
E-mail address: eric.copenhaver@clorox.com		
Application Preparer: Michael D. Zeiders		**Title:** Project Manager
Company: Liberty Environmental, Inc.		
Street or P.O. Box: 505 Penn Street, Suite 400		
City: Reading	**State:** PA	**Zip: 19601-**
Telephone Number: 610-375-9301	**Cell Number:** ( ) -	
E-mail address: mzeiders@libertyenviro.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Charcoal Briquet Manufacturing Facility	Charcoal briquets	325191	2861

Provide a general description of operations.

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, starch, borax, and solvent for briquets.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
☒ SIP	☐ FIP
☒ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☒ NESHAP (45CSR34)	☐ Nonattainment NSR (45CSR19)
☒ Section 111 NSPS	☒ Section 112(d) MACT standards
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☒ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☒ **C**ompliance **A**ssurance **M**onitoring (40CFR64)
☐ Cross-State Air Pollution Rule (45CSR43)	

19. Non Applicability Determinations

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

Existing (in current permit shield) Non-applicable Requirements		
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) having 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§7-10.1. They are exempt from the PM emission standards of 45CSR5.
PM emissions from an incinerator	45CSR§6-4.1.	The PM emission standard from 45CSR7 (45CSR§7-4.1.) also applies and is more stringent. Because of the "inconsistency between rules" provision in 45CSR6 and 7, the more stringent rule will apply and therefore the PM standard from 45CSR6 is moot and the Permit Shield applies.
Opacity limits for an incinerator	45CSR§6-4.3. and 4.4	The opacity standard from 45CSR7 (45CSR§§7- 3.1. and 3.2.) also applies and is more stringent. Because of the "inconsistency between rules" provision in 45CSR6 and 7, the more stringent rule will apply and therefore the opacity requirement from 45CSR6 is moot and the Permit Shield applies.
PM Emissions for wood charring and drying operations	45CSR§§7-2.39.b, c and d	Per Director's determination charring and drying operations are defined as type "a" for Parsons source, therefore they are not defined as type "b" or "c" or “d” sources operations for Parsons source also.
Testing, Monitoring, Recordkeeping and Reporting of Sulfur Oxides emissions	45 CSR 10-8	Facility's annual PTE for SO_2 is 129,200 lbs (>500 lbs), but per 45 CSR 10-10.3. partial wood combustion during the manufacture of charcoal shall be exempt from this requirement.
Preparation of standby plans for reducing the emissions of air pollution during periods of an Air Pollution Alert, Air pollution Warning, and Air pollution Emergency	45CSR§11-5.1.	This facility is not in Priority I or II regions, therefore it is not subject to this requirement

☒ Permit Shield

19. Non Applicability Determinations *(Continued)* - *Attach additional pages as necessary.*

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

Existing (in current permit shield) Non-applicable Requirements (Continued)		
Requirement	**Regulatory Citation**	**Basis for Non-Applicability**
Hazardous Air Pollutants Federal NESHAP standards	45 CSR 15 40 CFR 61	Parsons facility discharges less than 10 tpy of a single HAP and less than 25 tpy of aggregated HAPs, 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 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 and construction date (see **40 CFR60 Subpart Kb Applicability Table** in the Fact Sheet).
Fugitive emissions from material handling	45CSR17	Per 45CSR§7-6.1. 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 use listed chemicals
Federal Acid Rain provisions	45CSR33 Title IV of CAAA	No affected sources at Parsons facility
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 JJJJJJ	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 JJJJJJ.
New Non-applicable Requirements		
Requirement	**Regulatory Citation**	**Basis for Non-Applicability**

☒ Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*).

Existing Facility-Wide Requirements	
Requirement	**Regulatory Citation**
Odors	45CSR4
Open Burning	45CSR6
Fugitive Particulate Emissions and Opacity	45CSR7
SOx Emission Requirements	45CSR10
Air Pollution Episode Requirements	45CSR11
Construction Permitting	45CSR13
Fee Program	45CSR22
Title V Permitting	45CSR30
Confidential Information	45CSR31
Emission Inventory/Testing Requirements	WVa Code 22-5-4
Coal Preparation Plants NSPS	40CFR60, Subpart Y
Asbestos Demolition/Renovation	40CFR61
Risk Management Plan	40CFR68
Ozone Depleting Substances	40CFR82
Compliance Assurance Monitoring	40CFR64
Risk Management Plan	40CFR68
Please refer to the current Title V operating permit (R30-09300004-2019 MM02) for additional detail	

☒ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Facility-Wide Requirement Compliance Demonstration Methods		
Requirement	**Citation**	**Compliance Demonstration Method**
Existing Facility-Wide Requirements	See above	See existing Title V operating permit (R30-09300004-2019 MM02) for details

Are you in compliance with all facility-wide applicable requirements? ☒ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

20. Facility-Wide Applicable Requirements *(Continued)* - *Attach additional pages as necessary.*

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

See existing Title V operating permit (R30-09300004-2019 MM02) for details

☒ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/ reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See existing Title V operating permit (R30-09300004-2019 MM02) for details

Are you in compliance with all facility-wide applicable requirements? ☒ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

21. Active Permits/Consent Orders		
Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit *(if any)*
Title V Operating Permit No. R30-09300004-2019(MM02)	11/29/2022	See Section 2 of attached report
R13-1608M	7/10/2023	See Section 2 of attached report
R14-0001E	8/14/2023	See Section 2 of attached report
G60-C012A	8/21/2018	Not applicable
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22. Inactive Permits/Obsolete Permit Conditions		
Permit Number	Date of Issuance	Permit Condition Number
Not applicable	MM/DD/YYYY	
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Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	See Appendix B of attached report
Nitrogen Oxides (NO_X)	
Lead (Pb)	
Particulate Matter ($PM_{2.5}$)[1]	
Particulate Matter (PM_{10})[1]	
Total Particulate Matter (TSP)	
Sulfur Dioxide (SO_2)	
Volatile Organic Compounds (VOC)	
Hazardous Air Pollutants[2]	Potential Emissions
Lead	See Appendix B of attached report
Methanol	
Regulated Pollutants other than Criteria and HAP	Potential Emissions

[1]$PM_{2.5}$ and PM_{10} are components of TSP.
[2]For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)		
☒	1.	Air compressors and pneumatically operated equipment, including hand tools.
☐	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.
☒	3.	Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
☒	4.	Bathroom/toilet vent emissions.
☒	5.	Batteries and battery charging stations, except at battery manufacturing plants.
☒	6.	Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
☐	7.	Blacksmith forges.
☒	8.	Boiler water treatment operations, not including cooling towers.
☒	9.	Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
☐	10.	CO_2 lasers, used only on metals and other materials which do not emit HAP in the process.
☒	11.	Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
☒	12.	Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
☒	13.	Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
☐	14.	Demineralized water tanks and demineralizer vents.
☒	15.	Drop hammers or hydraulic presses for forging or metalworking.
☒	16.	Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
☐	17.	Emergency (backup) electrical generators at residential locations.
☐	18.	Emergency road flares.
☒	19.	Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO_2, VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis: E0A-02 through E-0A-08 See Attachment B for emissions information

24. Insignificant Activities (Check all that apply)		
☐	20.	Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27. Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis: _____ _____ _____ _____ _____
☐	21.	Environmental chambers not using hazardous air pollutant (HAP) gases.
☒	22.	Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
☐	23.	Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
☒	24.	Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
☐	25.	Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
☐	26.	Fire suppression systems.
☒	27.	Firefighting equipment and the equipment used to train firefighters.
☐	28.	Flares used solely to indicate danger to the public.
☒	29.	Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
☐	30.	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
☒	31.	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
☐	32.	Humidity chambers.
☐	33.	Hydraulic and hydrostatic testing equipment.
☒	34.	Indoor or outdoor kerosene heaters.
☒	35.	Internal combustion engines used for landscaping purposes.
☐	36.	Laser trimmers using dust collection to prevent fugitive emissions.
☐	37.	Laundry activities, except for dry-cleaning and steam boilers.
☒	38.	Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
☐	39.	Oxygen scavenging (de-aeration) of water.
☐	40.	Ozone generators.

24. Insignificant Activities (Check all that apply)		
☒	41.	Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
☐	42.	Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
☒	43.	Process water filtration systems and demineralizers.
☒	44.	Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
☒	45.	Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
☒	46.	Routing calibration and maintenance of laboratory equipment or other analytical instruments.
☐	47.	Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
☐	48.	Shock chambers.
☐	49.	Solar simulators.
☒	50.	Space heaters operating by direct heat transfer.
☐	51.	Steam cleaning operations.
☐	52.	Steam leaks.
☐	53.	Steam sterilizers.
☐	54.	Steam vents and safety relief valves.
☐	55.	Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
☒	56.	Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
☐	57.	Such other sources or activities as the Director may determine.
☒	58.	Tobacco smoking rooms and areas.
☒	59.	Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table

Fill out the **Title V Equipment Table** and provide it as **ATTACHMENT D**.

26. Emission Units

For each emission unit listed in the **Title V Equipment Table**, fill out and provide an **Emission Unit Form** as **ATTACHMENT E**.

For each emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.

27. Control Devices

For each control device listed in the **Title V Equipment Table**, fill out and provide an **Air Pollution Control Device Form** as **ATTACHMENT G**.

For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

No changes to existing CAM requirements or new sources subject to CAM requirements.

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

Note: This Certification must be signed by a responsible official as defined in 45CSR§30-2.38.

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Robert Boggs	Title: Plant Manager

Responsible official's signature:

Signature: R. J. Boggs (Must be signed and dated in blue ink or have a valid electronic signature) Signature Date: 12/14/23

Note: Please check all applicable attachments included with this permit application:

☒	ATTACHMENT A: Area Map
☒	ATTACHMENT B: Plot Plan(s)
☒	ATTACHMENT C: Process Flow Diagram(s)
☒	ATTACHMENT D: Equipment Table
☒	ATTACHMENT E: Emission Unit Form(s)
☒	ATTACHMENT F: Schedule of Compliance Form(s)
☒	ATTACHMENT G: Air Pollution Control Device Form(s)
☒	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

All of the required forms and additional information can be found and downloaded from, the DEP website at www.dep.wv.gov/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

KINGSFORD MANUFACTURING COMPANY

DELEGATION OF SIGNATURE AUTHORITY

Pursuant to the authority granted to the undersigned under the bylaws of Kingsford Manufacturing Company (the "Company"), in her capacity as Vice President - Secretary, the undersigned hereby delegates the right to execute the documents listed below, on behalf of the Company, to the Plant Manager designated below, or, in his/her absence, the acting plant manager, of the Company's facility designated below.

Robert Boggs
Parsons Plant; Parsons, West Virginia

Documents and Authority:

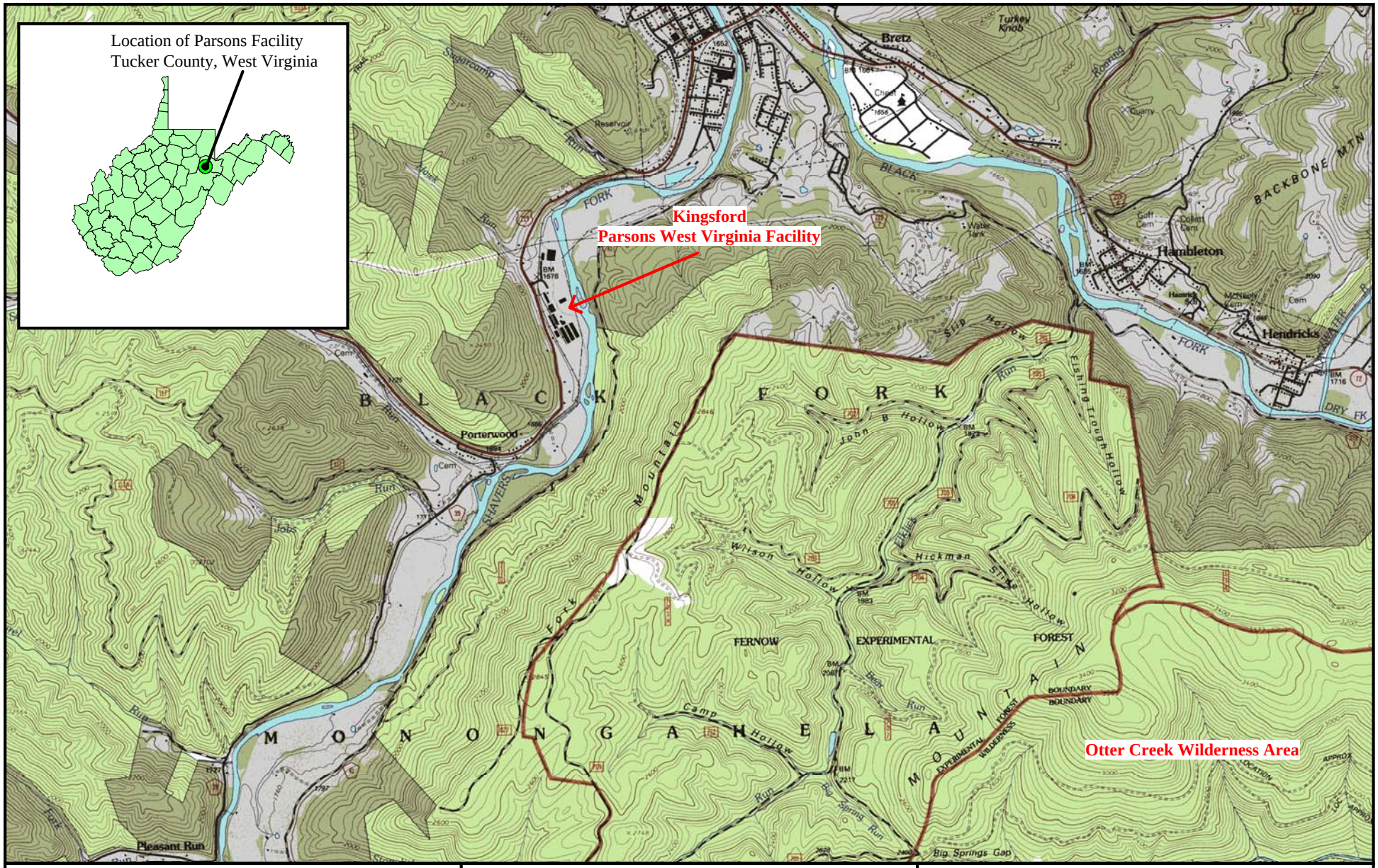
Authority to sign all environmental reports, plans, and permits, environmental monitoring reports, applications, certifications and other documents for the facility documents requiring the signature of a "Responsible Official," "Responsible Corporate Officer," or other company representative under any federal, state or local environmental law or regulation.

This delegation of authority requires that the person signing any document pursuant to this delegation satisfy himself or herself that, based on information and belief formed after reasonable inquiry, the statements or information in the document are true, accurate, and complete and that the document is otherwise in accordance with any required certification.

Dated: November 1, 2021

Iké Adeyemi
Vice President – Secretary

ATTACHMENT A
SITE LOCATION MAP



Attachment B
Kingsford Manufacturing Company
Parson, WV Facility

ATTACHMENT B
PLOT PLAN

REF	EMISSION POINT ID	CONTROL DEVICE	EMISSION UNIT ID	EMISSION UNIT DESCRIPTION
			CONTROL DEVICES	
A	S-01-01 (19A)	C-08	CONTROL DEVICE	AFTER COMB. CHAMBER C-08
B	19A, 19B	C-08	CONTROL DEVICE	SOLVENT CHILLER
C	S-06	C-01	CONTROL DEVICE	FABRIC FILTER DUST COLLECTOR (C-01)
D	S-07	C-02	CONTROL DEVICE	FABRIC FILTER DUST COLLECTOR (C-02)
E	S-08	C-03	CONTROL DEVICE	FABRIC FILTER DUST COLLECTOR (C-03)
F	S-10	C-07	CONTROL DEVICE	FABRIC FILTER DUST COLLECTOR (C-07)
G	S-13	C-11	CONTROL DEVICE	FABRIC FILTER DUST COLLECTOR (C-11)
H	S-14	C-12	CONTROL DEVICE	FABRIC FILTER DUST COLLECTOR (C-12)
I	S-15	C-13	CONTROL DEVICE	FABRIC FILTER DUST COLLECTOR (C-13)
J	S-16	C-14	CONTROL DEVICE	FABRIC FILTER DUST COLLECTOR (C-14)
K	S-17	C-15	CONTROL DEVICE	FABRIC FILTER DUST COLLECTOR (C-15)
L	S-18	C-16	CONTROL DEVICE	FABRIC FILTER DUST COLLECTOR (C-16)
N	S-20	C-18	CONTROL DEVICE	FABRIC FILTER DUST COLLECTOR (C-18)
O	S-23	C-21	CONTROL DEVICE	WET SCRUBBER (C-21)
Q	S-34	C-34	CONTROL DEVICE	WET SCRUBBER (C-34)
R	S-35	C-15	CONTROL DEVICE	FABRIC FILTER DUST COLLECTOR (C-15)
S	S-38	C-38	CONTROL DEVICE	WET SCRUBBER CONTROLLING E-06-05 RETORT CHAR SURGE BIN

REF.	EMISSION POINT ID	CONTROL DEVICE	EMISSION UNIT ID	EMISSION UNIT DESCRIPTION
			WOOD AND CHAR PILES	
1	S-09	NONE	E-01-01	WOOD PILE MANAGEMENT
2	S-09	NONE	E-01-02	CHAR AND COAL PILE MANAGEMENT
			RAW MATERIAL HANDLING	
3	S-09	NONE	E-02-01	TRANSFER FROM DRAG PIT TO 48" BELT
4	S-09	NONE	E-02-02	PRIMARY SCREENING
5	S-09	NONE	E-02-03	SECONDARY SCREENING
6	S-09	NONE	E-02-04	600FT BELT TO DRYER FEED BIN
7	S-09	NONE	E-02-05	WOOD WITH METAL BYPASS BELT
8	S-09	NONE	E-02-06	WOOD DRYER BIN BYPASS SCREW
9	S-09	NONE	E-02-07	CHAR TRAILER TRANSPORT
10	S-34	C-34	E-02-09	CHAR & COAL TRUCK DUMPING
11	S-09	NONE	E-02-0A	BULK COAL TANK TO BELT TRANSFER: COARSE SCREENER, SCREW, & BELT
13	S-09	NONE	E-02-0C	CHAR HAMMER MILL
14	S-09	NONE	E-02-0D	WOOD SIZING PRIMARY AND SECONDARY HAMMER MILLS
14.A	S-09	NONE	E-02-0E	LIMESTONE HANDLING
			WOOD DRYING AND CHARRING SYSTEM	
15	S-01-01	C-08	E-03-01	WOOD DRYER & OUTLET BOX
				RETORT FURNACE
				FOUR DRYER CYCLONES (C-05)
				FOUR FURNACE CYCLONES (C-06)
			BRIQUET DRYERS AND COOLERS	
16	S-01-03 S-01-04	NONE	E-03-02	AEROGLIDE BRIQUET DRYER #1 & PORTION OF ACC EXHAUST GASES
17	S-01N-05 S-01N-06	NONE	E-03-03N	AEROGLIDE BRIQUET DRYER#2 & A PORTION OF ACC EXHAUST; GASES
18	S-02-01 S-02-02 S-02-03	NONE	E-04-01	BRIQUET COOLER #1
19	S-03N-01 S-03N-02 S-03N-03	NONE	E-04-02N	BRIQUET COOLER #2
			SOLVENT TREATED BRIQUET PRODUCTION	
20	19A (ACC STACK S-01-01)	C-08 SOLVENT CHILLER	E-05-01	#1 WEIGH CONVEYOR TRANSFER CONVEYOR SPRAY APPLICATOR TAKE AWAY CONVEYOR #2 WEIGH CONVEYOR PRODUCT OUT FEED CONVEYOR SUMP SMP-100 PACKAGING SURGE BIN SCREENER PHS-100
21	19B (BYPASS STACK S-04)	SOLVENT CHILLER		#1 WEIGH CONVEYOR TRANSFER CONVEYOR SPRAY APPLICATION TAKE AWAY CONVEYOR TAKE AWAY CONVEYOR #2 WEIGH CONVEYOR PRODUCT OUT FEED CONVEYOR SUMP SMP-100 PACKAGING SURGE BIN SCREENER PHS-100
22	S-32	CONSERVATION VENT		SOLVENT TANK #1, #2, #3, #4, #5
		NONE		STB SOLVENT HANDLING EQUIPMENT STB BRIQUET FINES
			MINOR INGREDIENTS BATCHING SYSTEM/DRY STORAGE	
23	S-10	C-07	E-06-01	COAL TANK
24	S-10	C-07	E-06-02	BERYL CHAR TANK
25	S-11	NONE	E-06-03	RERUN CHAR TANK
26	S-12	NONE	E-06-04	CHAR TANK
27	S-13 S-37	C-11 C-37	E-06-05	CHAR TANKS AND TRANSFER VENTURI SCRUBBER
28	S-14	C-12	E-06-06	BULK LIME TANK
29	S-15	C-13	E-06-07	NOT USED (NITRATE BULK TANK)
30	S-16	C-14	E-06-08	BULK STARCH TANK
31	S-17	C-15	E-06-09	LIME USE TANK
32	S-18	C-16	E-06-0A	WET STARCH USE TANK
33	S-19	C-17	E-06-0B	DRY STARCH USE TANK (REMOVED)
34	S-20	C-18	E-06-0C	BORAX USE TANK
35	S-22	C-20	E-06-0E	MULLER VENT
36	S-23	C-21	E-06-0F	MINORS BATCH MIXING
			NATURAL GAS BURNING	
38		NONE		NEW ACC BURNER #2
		C-08		ACC BURNER #1
	S-07-01	C-08	E-07-01	FURNACE BURNERS
		NONE		WASTE HEAT BOILER
		NONE		AUXILIARY HEAT BURNER
			BRIQUET HANDLING	
39	S-06	C-01	E-08-01	BRIQUET DRYER DISCHARGE CONVEYORS
40	S-07	C-02	E-08-02A	BRIQUET PKG LINE – WEIGH SCALES
41	S-07	C-02	E-08-02B	BRIQUET PKG LINE – BAG FILLING
42	S-08	C-03	E-08-03A	FINISHED BRIQUET HANDLING – SILO INFEED BUCKET ELEVATOR
43	S-08	C-03	E-08-03B	FINISHED BRIQUET HANDLING – SILO INFEED CONVEYOR
44	S-08	C-03	E-08-03C	FINISHED BRIQUET HANDLING – BRIQUET STROAGE SILOS
45	S-08	C-03	E-08-03D	FINISHED BRIQUET HANDLING – LINE A TAKE AWAY CONVEYORS
46	S-08	C-03	E-08-03E	FINISHED BRIQUET HANDLING – LINE B TAKE AWAY CONVEYORS
47	S-08	C-03	E-08-03F	FINISHED BRIQUET HANDLING – LINE A BUCKET ELEVATOR
48	S-08	C-03	E-08-03G	FINISHED BRIQUET HANDLING – LINE A TRANSFER CONVEYORS
49	S-35	C-35	E-08-03H	PACKAGING SCALE BIN INFEED

		PLANT ROADS		
50	S-09	NONE	E-09-01	PAVED PLANT ROADS
51	S-09	NONE	E-09-02	UNPAVED PLANT ROADS
		LIQUID STORAGE		
52	S-25	C-25	E-0A-01	UNLEADED GASOLINE
53	S-26	C-26	E-0A-02	DIESEL OIL
54	S-27	C-27	E-0A-03	KEROSENE
55	S-31	C-31	E-0A-07	NOT USED / OUT OF SERVICE
56	S-32	C-32	E-0A-08	USED OIL
		EMERGENCY EQUIPMENT		
57	N/A	NONE	E-0B-01	EMERGENCY FLOOD PUMPS
58	S-36	CATALYST	E-0B-02	EMERGENCY GENERATOR
59	S-33	NONE	FP-2	SOUTH FIRE PUMP
60	S-35	NONE	N/A	SOUTH DIESEL FUEL STORAGE TANK

REVISION	BY	DATE	REVISION	BY	DATE
△ UPDATED LAYOUT AND ADDED EMISSION POINTS	ETD	5/30/13	△		
△ UPDATED LAYOUT AND EMISSION POINTS	JFG	5/24/18	△		
△ TABLE EDITS	JRY	12/13/23	△		
△			△		
△			△		
△			△		
△			△		

TOLERANCES (EXCEPT AS NOTED)
DECIMAL ∈
FRACTIONAL ∈
ANGULAR ∈

DRAWN BY WAH
DATE 8/4/95
CK BY
DATE
APPROVED BY
DATE

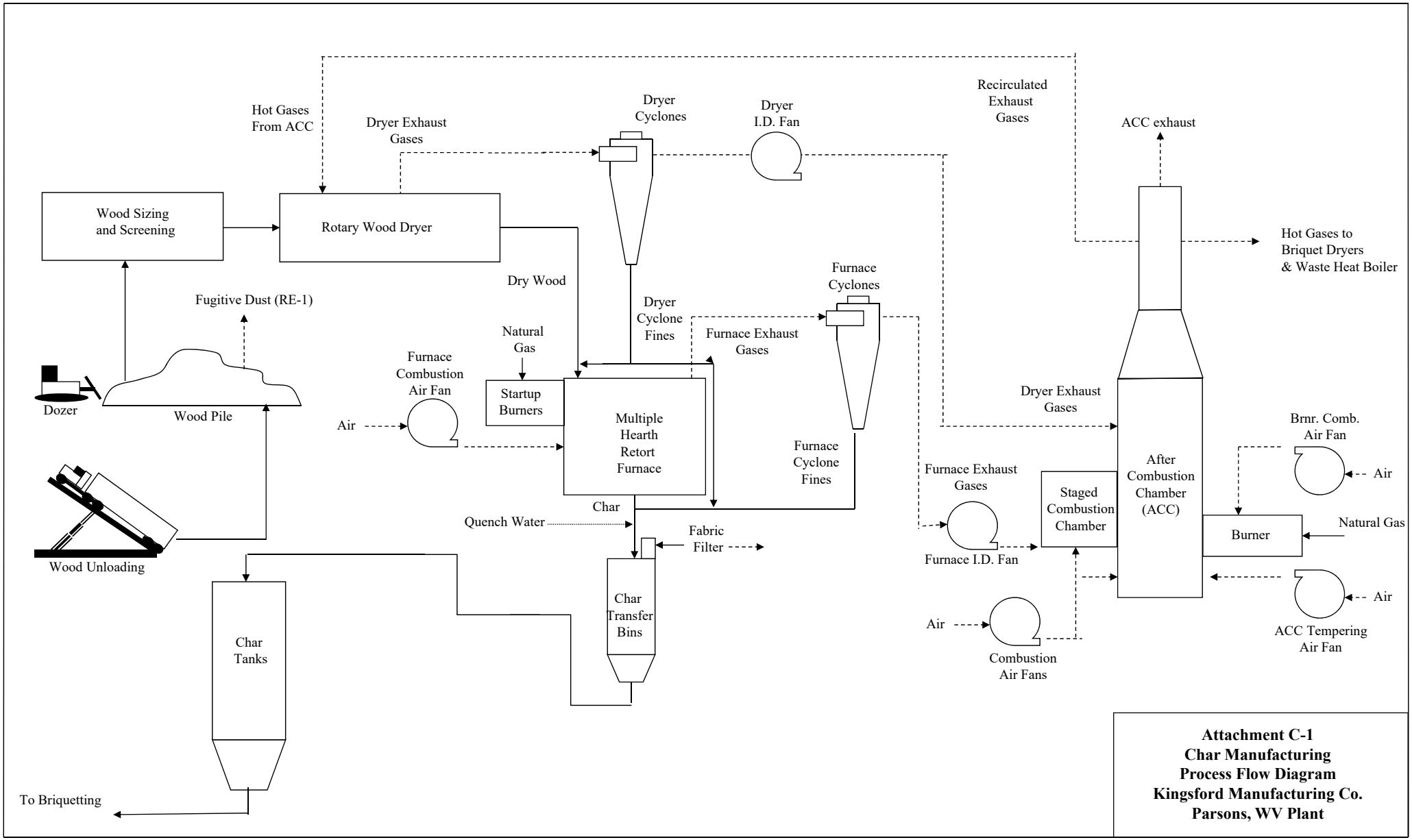
The Kingsford Products Company

TITLE
STACK & FUGITIVE SOURCE LOCATIONS

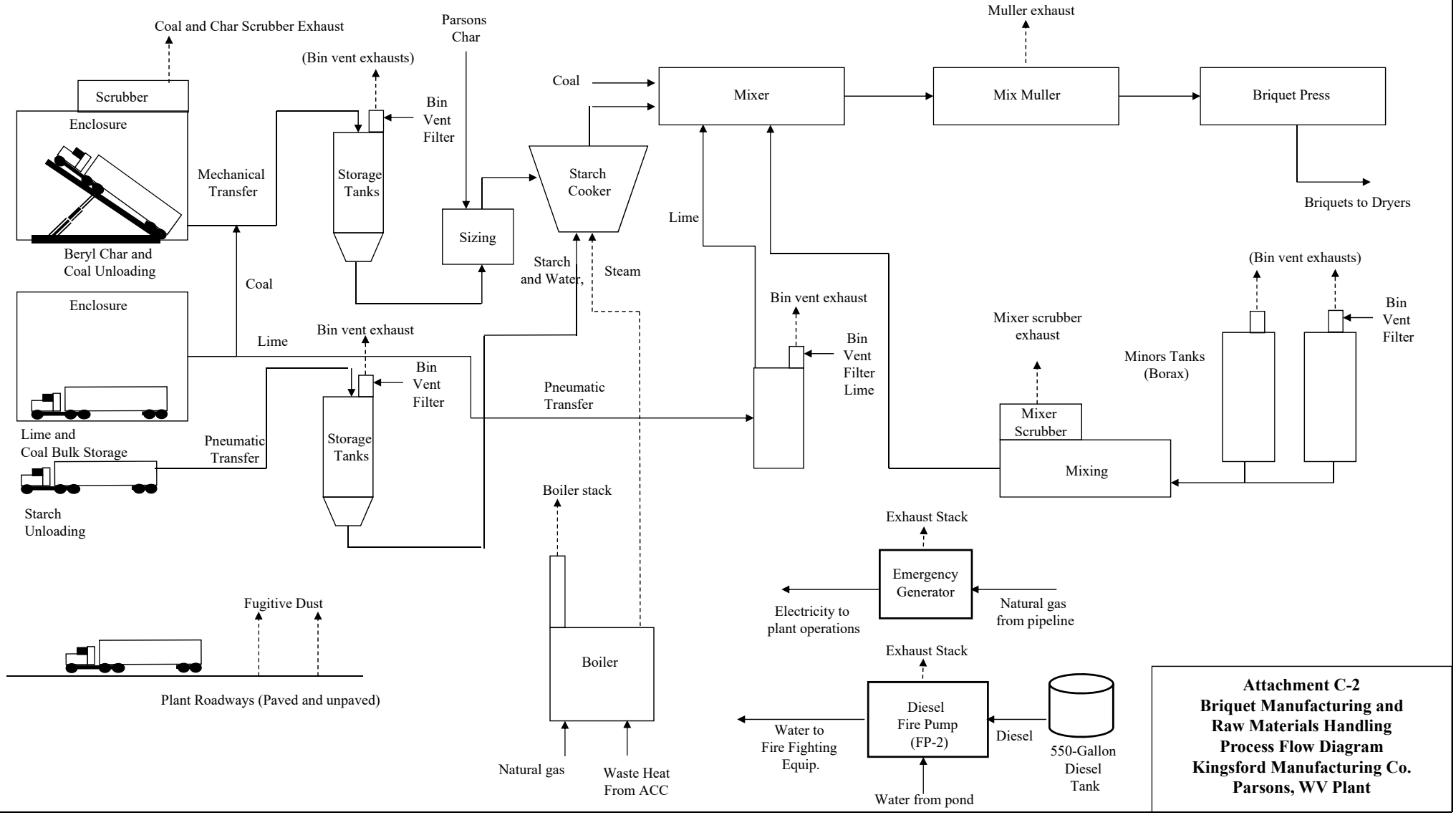
DIVISION OR SUBSIDIARY
LOCATION PARSONS PLANT

SCALE SCALE: 1"=100'
DRAWING NUMBER 0020 -D- 0176 △

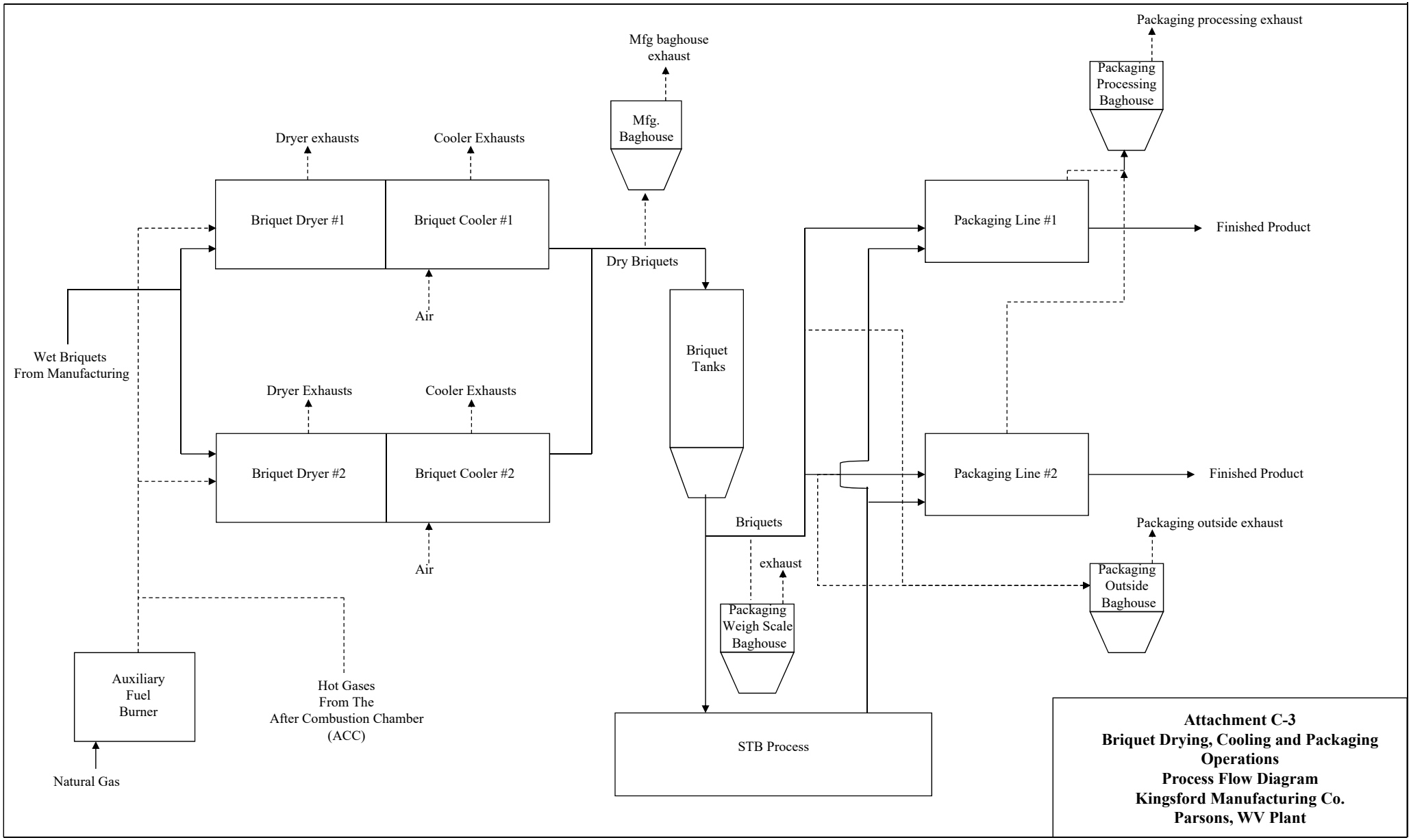
ATTACHMENT C
PROCESS FLOW DIAGRAM



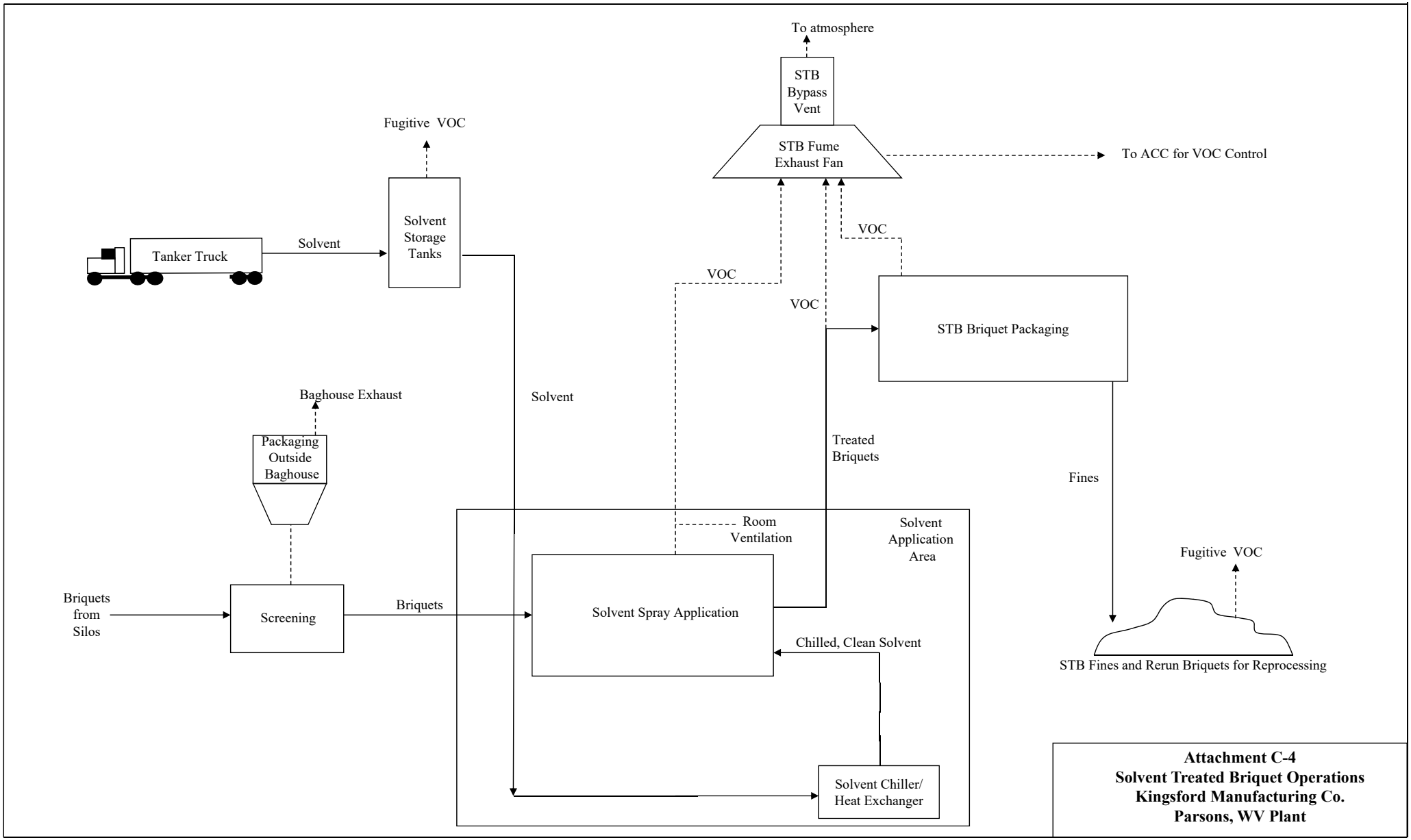
Attachment C-1
Char Manufacturing
Process Flow Diagram
Kingsford Manufacturing Co.
Parsons, WV Plant



Attachment C-2
Briquet Manufacturing and Raw Materials Handling Process Flow Diagram
Kingsford Manufacturing Co.
Parsons, WV Plant



Attachment C-3
Briquet Drying, Cooling and Packaging Operations
Process Flow Diagram
Kingsford Manufacturing Co.
Parsons, WV Plant



Attachment C-4
Solvent Treated Briquet Operations
Kingsford Manufacturing Co.
Parsons, WV Plant

ATTACHMENT D
TITLE V EQUIPMENT TABLE

ATTACHMENT D - Title V Equipment Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID[1]	Emission Point ID[1]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device[1]
See current operating permit (R30-09300004-2019 MM02) for complete equipment list. Requested changes are shown below and are associated with R13-1608M and R14-0001E.					
E-02-09	S-34	Char and Coal Truck Dumping	1963/2023	116,000	Truck Dump Scrubber (C-34)
E-05-01	19A (ACC Stack S-01-01)	#1 Weigh Conveyor	2023	20/13 TPH	ACC (C-08), Solvent Chiller
		Transfer conveyor	2023	20/13 TPH	
		Spray Application	2023	20/13 TPH	
		Take away conveyor	2023	20/13 TPH	
		#2 Weigh Conveyor	2023	20/13 TPH	
		Product Out Feed Conveyor	1982/1994	20/13 TPH	
		Sump SMP-100	1982/1994	20/13 TPH	
		Packaging Surge Bin	1982/1994	20/13 TPH	
		Screener PHS-100	1982/1994	20/13 TPH	
	19A (ACC Bypass Stack S-04)	#1 Weigh Conveyor	2023	20/13 TPH	Solvent Chiller
		Transfer conveyor	2023	20/13 TPH	
		Spray Application	2023	20/13 TPH	
		Take away conveyor	2023	20/13 TPH	
		#2 Weigh Conveyor	2023	20/13 TPH	
		Product Out Feed Conveyor	1982/1994	20/13 TPH	
		Sump SMP-100	1982/1994	20/13 TPH	
		Packaging Surge Bin	1982/1994	20/13 TPH	
		Screener PHS-100	1982/1994	20/13 TPH	
	S-32	Solvent tank #1	1982	15,000 gal	Conservation Vent
		Solvent tank #2	1982	15,000 gal	Conservation Vent
		Solvent tank #3	1982	10,000 gal	Conservation Vent
		Solvent tank #4	1982	10,000 gal	Conservation Vent
		Solvent tank #5	1982	10,000 gal	Conservation Vent
		STB/solvent handling equipment	1982/1994	Unknown	None
		STB Briquet Fines	1982/1994	Unknown	None

E-06-09	S-17	Lime Use Tank	1958/2016/ 2023	6 ton	Fabric Filter Dust Collector (C-15)
N/A	S-17	Fabric Filter Dust Collector (C-15) Mfg: Schenck Process., 39AVRC14, Style II	2003/2016/ 2023	560 cfm	None
E-0A-01	S-25	Unleaded Gasoline	2020	500 gal	Conservation Vent (C-25)

[1]For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT E
EMISSION UNIT FORMS

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
001-01, 02	Wood Pile and Dry Wood Receipt E-01-01 Char and Coal Pile E-01-02	E-01-02 Char and Coal Shed

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Wood and dry sawdust is received via truck and unloaded onto the wood pile (E-01-01) where it is managed by use of a bulldozer. Wood is dumped directly onto the pile. Char and coal pile management (E-01-02)consists of management of the outside concrete pad and char shed by a front end loader, dumping of material by dump trucks and loaders, and movement by loader to silo hoppers.

Manufacturer:	**Model number:**	**Serial number:**
Not applicable	Not applicable	Not applicable

Construction date:	**Installation date:**	**Modification date(s):**
E-01-01 1972/1994 E-01-02 1958	E-01-01 1972/1994 E-01-02 1958	E-01-01 1972/1994 E-01-02 1958

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
E-01-01 Dry wood receipt – 120 tph

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
E-01-01 Dry wood receipt 120 tph	Not determined	8,760 hours per year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes X No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: Not applicable	**Type and Btu/hr rating of burners:** Not applicable

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Not applicable

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Not applicable			

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(Per Title V Operation Permit No. R30-09300004-2019MM02)

9.0 Wood, Char and Coal Piles, Raw Material Handling and Plant Roads Requirements

9.1. Limitations and Standards

9.1.1. The permittee shall inspect all fugitive dust control systems, specified in the Emission Units Table 1.0 for Emission Point S-09, weekly to ensure that they are operated and maintained in conformance with their designs.
[45CSR§30-5.1.c]

9.1.2. Good operating practices shall be implemented and when necessary dust suppressants shall be applied in relation to stockpiling and general material handling to prevent dust generation and atmospheric entrainment. **[45CSR§7-5.2]**

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

9.2. Monitoring Requirements

9.2.1. Visible emissions monitoring as per Requirement 3.2.1. Weekly Method 22 checks shall be conducted for a minimum of 6 consecutive weeks for all emission points listed in Emission Units Table 1.0 under Wood, Char and Coal Piles, Raw Material Handling and Plant Roads (including visible fugitive dust emissions that leave the plant site boundaries). If in compliance, then monthly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.1, then for this emission point monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR13, R13-1608, 4.2.2 and 45CSR§30-5.1.c]

9.2.2. Each opacity evaluation observation per 45CSR§7A-2.1.a,b as per Requirement 3.2.1 shall be a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) without averaging of results, unless any one single reading is greater that the opacity limit for the emission unit, in which case the observation period shall be extended to a 60 minutes or until a violation of the emissions standard per 45CSR§7-3.2. has been documented (more than twenty (20) single opacity readings are in excess of 20% opacity, but less than 40% opacity, or any single reading is equal or in excess of 40% opacity); whichever is the shorter period. **[45CSR§30-5.1.c]**

9.3. Testing Requirements

9.3.1. N/A

9.4. Recordkeeping Requirements

9.4.1. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility (piles, transfer points, paved and unpaved roads). **[45CSR§30-5.1.c]**

9.4.2. The permittee shall maintain records of the results of weekly inspections of the systems to minimize fugitive emissions per Requirement 9.1.2. Records shall state the times the systems were inoperable, what corrective actions taken as a result of the weekly inspections and all scheduled and unscheduled maintenance procedures.
[45CSR§30-5.1.c]

9.4.3. Visible emission checks recordkeeping as per requirement 9.2.1.

9.5. Reporting Requirements

9.5.1. Opacity exceedance reporting as per requirement 3.5.8.a.1.

9.6. Compliance Plan

9.6.1. N/A

Are you in compliance with all applicable requirements for this emission unit? _X__Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
002-01 through 07, 09, 0A-0E	Raw Material Handling	E-02-02,03,05,06,07,0B None E-02-01,04,0A,0E Partial Enclosure E-02-09 Truck Dump Scrubber (C-34) E-02-0C,0D Full Enclosure

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Wood is transferred from the wood pile via a conveyor (E-02-01)to a series of screening and sizing operations(E-01-02 through E-02-06, E-02-0D). It is then conveyed to the wood dryer. Coal and char is received by truck and unloaded at a dumping station (E-02-09) that is controlled by the wet ~~mixing~~ scrubber (C-34). The material is sized in the char hammermill (E-02-0C) and then transferred to the char and coal silos by screw conveyors and bucket elevators (E-02-0A, 0B). Bulk lime trucks can be unloaded (E-02-0E) in the existing shed and then the lime is either transferred pneumatically to the lime silo or via front end loader/covered conveyor to the briquette mixing operations.

Manufacturer:	**Model number:**	**Serial number:**
Not applicable	Not applicable	Not applicable
Construction date:	**Installation date:**	**Modification date(s):**
See Attachment D	See Attachment D	See Attachment D

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
See Attachment D

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
See Attachment D	See Attachment D	8,760 hours per year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes X No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: Not applicable	**Type and Btu/hr rating of burners:** Not applicable

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Not applicable

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Not applicable			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(Per Title V Operation Permit No. R30-09300004-2019MM02)

9.0 Wood, Char and Coal Piles, Raw Material Handling and Plant Roads Requirements

9.1. Limitations and Standards

9.1.1. The permittee shall inspect all fugitive dust control systems, specified in the Emission Units Table 1.0 for Emission Point S-09, weekly to ensure that they are operated and maintained in conformance with their designs.
[45CSR§30-5.1.c]

9.1.2. Good operating practices shall be implemented and when necessary dust suppressants shall be applied in relation to stockpiling and general material handling to prevent dust generation and atmospheric entrainment. **[45CSR§7-5.2]**

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

9.2. Monitoring Requirements

9.2.1. Visible emissions monitoring as per Requirement 3.2.1. Weekly Method 22 checks shall be conducted for a minimum of 6 consecutive weeks for all emission points listed in Emission Units Table 1.0 under Wood, Char and Coal Piles, Raw Material Handling and Plant Roads (including visible fugitive dust emissions that leave the plant site boundaries). If in compliance, then monthly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.1, then for this emission point monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR13, R13-1608, 4.2.2 and 45CSR§30-5.1.c]

9.2.2. Each opacity evaluation observation per 45CSR§7A-2.1.a,b as per Requirement 3.2.1 shall be a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) without averaging of results, unless any one single reading is greater that the opacity limit for the emission unit, in which case the observation period shall be extended to a 60 minutes or until a violation of the emissions standard per 45CSR§7-3.2. has been documented (more than twenty (20) single opacity readings are in excess of 20% opacity, but less than 40% opacity, or any single reading is equal or in excess of 40% opacity); whichever is the shorter period. **[45CSR§30-5.1.c]**

9.3. Testing Requirements

9.3.1. N/A

9.4. Recordkeeping Requirements

9.4.1. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility (piles, transfer points, paved and unpaved roads). **[45CSR§30-5.1.c]**

9.4.2. The permittee shall maintain records of the results of weekly inspections of the systems to minimize fugitive emissions per Requirement 9.1.2. Records shall state the times the systems were inoperable, what corrective actions taken as a result of the weekly inspections and all scheduled and unscheduled maintenance procedures.
[45CSR§30-5.1.c]

9.4.3. Visible emission checks recordkeeping as per requirement 9.2.1.

9.5. Reporting Requirements

9.5.1. Opacity exceedance reporting as per requirement 3.5.8.a.1.

9.6. Compliance Plan

9.6.1. N/A

Are you in compliance with all applicable requirements for this emission unit? _X__Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
003-01	Wood Dryer and Outlet Box Retort Furnace Four (4) Dryer Cyclones Four Furnace Cyclones Retort Furnace	ACC (C-08)

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Sized wet wood is dried by the wood dryer with heat provided by the ACC. The dried wood is fed to the retort furnace where it is converted into char through pyrolysis in a starved air environment. Heat is provided to the dryer by the ACC(C-08) afterburner. The dryer exhaust passes through the dryer cyclones followed by the ACC (C-08). The retort exhaust passes through the furnace cyclones followed by the ACC. The cyclones are used for material recovery and dried wood and char particles collected by the cyclones are combined with char produced by the furnace.

Manufacturer:	**Model number:**	**Serial number:**
Dryer Louisville Retort Furnace: Skinner Dryer Cyclones: Fisher Klosterman Furnace Cyclones: Fisher Klosterman	Dryer Cyclones: XQ120-33 Furnace Cyclones: XQ120-23	Not applicable

Construction date:	**Installation date:**	**Modification date(s):**
Dryer:2007 Retort Furnace:1972 Dryer Cyclones:2003 Furnace Cyclones:1984	2007 1972 2003 1985	2007 1972 2003 1984

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
E-03-01 38.5 tph dry wood

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
E-03-01 38.5 tph dry wood	Not determined	8,760 hours per year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? __X_Yes No	**If yes, is it?** ___ Indirect Fired _X_Direct Fired
Maximum design heat input and/or maximum horsepower rating: See Source ID E-05 for details.	**Type and Btu/hr rating of burners:** See Source ID E-05 for details.

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
See Source ID E-05 for details.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
See Source ID E-05 for details.			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(Per Title V Operation Permit No. R30-09300004-2019MM02)

4.0 Wood Drying and Charring Requirements

4.1. Limitations and Standards

4.1.1. The Wood Dryer/Retort Furnace system (E-03-01) processing rate shall not exceed 38.5 tons per hour of dry wood and 209,000 tons per year of dry wood.
[45CSR13, R13-1608, 4.1.2]

4.1.2. Emissions generated as a result of the operation of the Wood Dryer/Retort Furnace (E-03-01) shall be routed to and combusted by the After Combustion Chamber (ACC, control device C-08) prior to their release to the atmosphere.
[45CSR13, R13-1608, 4.1.5]

4.1.3. Emissions to the atmosphere from the Wood Dryer/Retort Furnace (E-03-01) vented through ACC stack
(Emission point S-01-01) shall be limited to the following when the Briquet Dryers are in operation:

Emission Point ID	Pollutant	Maximum Allowable Emissions (lbs/hr)	Maximum Allowable Emissions (TPY)
S-01-01	NO_x	74.4	201.88
	CO	5.9	1.0
	VOC	1.0	1.15
	SO_2	20.23	54.91
	PM	50.6	137.28
	PM_{10}	40.5	109.82
	Methanol	-	3.15

[45CSR13, R13-1608, **4.1.7 and 45CSR§7-4.1**]

Compliance with the hourly PM emission limits set forth in this Requirement will demonstrate compliance with 45CSR§7-4.1 maximum allowable PM emission rates.

4.1.4. The control devices in the Emission Units Table 1.0. for the Wood Dryer and Retort Furnace shall be maintained and operated as per requirement 3.1.21.
[45CSR§30-12.7]

4.1.5. The permittee shall inspect all control systems, specified in the Emission Units Table 1.0 for the Wood Dryer and Retort Furnace, weekly to ensure that they are operated and maintained in conformance with their designs.
[45CSR§30-5.1.c]

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

4.2. Monitoring Requirements

4.2.1. The permittee shall monitor temperature of the cyclones' gas flow in order to assure compliance with the
Requirement 4.1.4.
[45CSR§30-5.1.c]

4.3. Testing Requirements

4.3.1. Testing per Section 3.3 Requirements.

4.4. Recordkeeping Requirements

4.4.1. Compliance with the hourly maximum processing rates listed in Requirement 4.1.1 shall be calculated on the basis of a rolling 30-day average expressed in tons per hour based on the hours of production for any specific
30-day period. Compliance with the yearly maximum processing rate in Requirement 4.1.1 shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of material processed, in tons, at the end of each month for that month and the previous 11 months.
[45CSR13, R13-1608, 4.1.4]

4.4.2. The following information shall be recorded and maintained in accordance with Condition 3.4.2 of this permit.:
a. amount of dry wood charged to the Wood Dryer/Retort Furnace (E-03-01) on a daily basis;
b. hours of operation for Wood Dryer and Retort Furnace on a daily basis;
c. hourly dry wood processing rate calculated as per Requirement 4.4.1.
d. yearly dry wood processing rate calculated as per Requirement 4.4.1.
[45CSR13, R13-1608, 4.2.1]

4.4.3. The permittee shall maintain records of the results of weekly inspections of the control systems per requirement 4.1.5. Records shall state the times the systems were inoperable, what corrective actions taken as a result of the weekly inspections and all scheduled and unscheduled maintenance procedures. **[45CSR§30-5.1.c]**

4.5. Reporting Requirements

4.5.1. None.

4.6. Compliance Plan

4.6.1. N/A

Are you in compliance with all applicable requirements for this emission unit? _X__Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
E-03-02,03N E04-01, 02N	Briquet Dryers and Coolers	None

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
After being pressed, the wet "green" briquets are transferred via belt conveyors to one of two briquet dryers. The briquets are conveyed through the briquet dryers on a traveling grate through which hot ACC gases are passed to dry the briquets. The briquet coolers pass ambient air through the briquet beds in the cooling zones. The dry briquets are then conveyed to storage silos before packaging.

Manufacturer:	**Model number:**	**Serial number:**
See Attachment D	See Attachment D	Not applicable

Construction date:	**Installation date:**	**Modification date(s):**
See Attachment D	See Attachment D	See Attachment D

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
See Attachment D

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
See Attachment D	154,000 tons briquets	8,760 hours/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes X No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: Not applicable	**Type and Btu/hr rating of burners:** Not applicable

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Not applicable

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Auxiliary heat provided by auxiliary heat burner (See E07)			

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(Per Title V Operation Permit No. R30-09300004-2019MM02)

6.0 Briquet Dryers and Coolers Requirements

6.1. Limitations and Standards

6.1.1. The Briquet Dryer/Cooler system (E-03-02, E-03-03N, E-04-01, E-04-02N) processing rate shall not exceed 24 tons per hour of dry packaged briquets and 154,000 tons per year of dry packaged briquets (excluding weight of the solvent and packaging material). **[45CSR13, R13-1608, 4.1.3]**

6.1.2. Total emissions to the atmosphere from the Briquet Dryers' (E-03-02 and E-03-03N) stacks (Emission points
S-01-03, S-01-04, S-01N-05, S-01N-06) shall be limited to the following:

Emission Point ID	Pollutant	Maximum Allowable Emissions (lbs/hr)	Maximum Allowable Emissions (TPY)
S-01-03 S-01-04 S-01N-05 S-01N-06	NO_x	13.13	35.63
	CO	6.0	12.31
	VOC	1.65	5.5
	SO_2	3.57	9.69
	PM	12	38.5
	PM_{10}	6	19.25
	Methanol	-	0.55

[45CSR13, R13-1608, 4.1.8]

6.1.3. Total emissions to the atmosphere from the Briquet Coolers' (E-04-01 and E-04-02N) stacks (Emission points
S-02-01, S-02-02, S-02-03, S-03N-01, S-03N-02, S-03N-03) shall be limited to the following:

Emission Point ID	Pollutant	Maximum Allowable Emissions (lbs/hr)	Maximum Allowable Emissions (TPY)
S-02-01 S-02-02 S-02-03 S-03N-01 S-03N-02 S-03N-03	PM	12	38.5
	PM_{10}	6	19.25

[45CSR13, R13-1608, 4.1.9]

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

6.2. Monitoring Requirements

6.2.1. Opacity monitoring per Requirement 3.2.1. Weekly Method 22 checks shall be conducted for a minimum of6 consecutive weeks for all the emission points listed in Emission Units Table 1.0 under Briquet Coolers and Dryers. If in compliance, then monthly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.1, then for this emission point monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.**[45CSR§30-5.1.c and 45CSR13, R13-1608, 4.2.2]**

6.2.2. Each opacity evaluation observation per 45CSR§7A-2.1.a,b as per Requirement 3.2.1 shall be a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) without averaging of results, unless any one single reading is greater than the opacity limit for the emission unit, in which case the observation period shall be extended to a 60 minutes or until a violation of the emissions standard per 45CSR§7-3.2 has been documented (more than twenty (20) single opacity readings are in excess of 20% opacity, but less than 40% opacity, or any single reading is equal or in excess of 40% opacity); whichever is the shorter period. **[45CSR§30-5.1.c]**

6.3. Testing Requirements

6.3.1. Testing per Section 3.3 Requirements.

6.4. Recordkeeping Requirements

6.4.1. Compliance with the hourly maximum processing rates listed in Requirement 6.1.1 shall be calculated on the basis of a rolling 30-day average expressed in tons per hour based on the hours of production for any specific 30-day period. Compliance with the yearly maximum processing rates in Requirement 6.1.1. shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of material processed, in tons, at the end of each month for that month and the previous 11 months.**[45CSR13, R13-1608, 4.1.4]**

6.4.2. The following information shall be recorded and maintained in accordance with Condition 3.4.2 of this permit.

a. total weight of dry briquets produced by the facility on a daily basis (excluding weight of the solvent and packaging material);
b. hours of operation for Briquet Dryers and Briquet Coolers on a daily basis;
c. hourly dry packaged briquets processing rate calculated as per Requirement 6.4.1.
d. yearly dry packaged briquets processing rate calculated as per Requirement 6.4.1.

[45CSR13, R13-1608, 4.2.1]

6.4.3. Visible emission checks recordkeeping as per requirement 6.2.1.

6.5. Reporting Requirements

6.5.1. Opacity exceedance reporting as per requirement 3.5.8.a.1.

6.6. Compliance Plan

6.6.1. N/A

Are you in compliance with all applicable requirements for this emission unit? _X__Yes ___No
If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
E-05-01 (19A, 19B, & S-32)	Solvent Treated Briquet Production See Attachment D	See Attachment D

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Solvent treated briquets (STB) are produced by applying solvent to dry briquets using a system consisting of solvent storage tanks, briquet handling equipment and a spray application system. Solvent evaporation is minimized through the use of a solvent chiller which maintains the solvent a cooled (less volatile) temperature. Solvent fumes from the operation are ducted to and controlled by the ACC (C-08) or are vented to atmosphere via the STB bypass vent.

Manufacturer:	**Model number:**	**Serial number:**
Not applicable	Not applicable	Not applicable
Construction date:	**Installation date:**	**Modification date(s):**
See Attachment D	See Attachment D	See Attachment D

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
See Attachment D

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
See Attachment D	See Attachment D	8,760 hours/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes X No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: Not applicable	**Type and Btu/hr rating of burners:** Not applicable

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Not applicable

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Not applicable			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(Per Title V Operation Permit No. R30-09300004-20119MM02)

7.0 Solvent Treated Briquet Process Requirements

7.1. Limitations and Standards

7.1.1. Volatile organic compound (VOC) emissions from the following equipment or areas shall be contained, captured and vented to either the After Combustion Chamber (ACC), Emission Point 19A, or to the ACC Bypass Stack, Emission Point 19B.

#1 Weigh Conveyor
Transfer conveyor
Spray Application
Take away conveyor
#2 Weigh Conveyor
Product Out Feed Conveyor
Sump SMP-100
Packaging Surge Bin
Screener PHS-100

[45CSR14, R14-0001, A.1]

7.1.2. VOC emissions from the ACC Bypass Stack (Emission Point 19B, Stack S-04) shall not exceed 36.6 lb/hr. VOC emissions from the ACC (Emission Point 19A, Stack S-01-01) shall not exceed 2.82 lb/hr above the baseline VOC emissions present prior to venting solvent treated briquet (STB) process VOC emissions to the ACC.
[45CSR14, R14-0001, A.2]

7.1.3. Total VOC emissions from all emission points or sources (including pumps, valves, flanges, etc.) associated with the STB production facility shall not exceed 83 TPY as determined by Requirement 7.4.1.

Summary Table of VOC emission limits for STB Process

Emission Description	Emission Point ID / Stack ID	Maximum Allowable VOC Emissions (lbs/hr)	Maximum Allowable Emissions (TPY)
STB Fume Exhaust	19A / S-01-01	2.82	83
	19B / S-04	36.6	
STB Briquet Fines	S-32	-	
STB Fixed Emissions	S-32	-	

[45CSR14, R14-0001, A.3]

7.1.4. VOC emissions from the sources listed in Requirement 7.1.1 shall be vented to the ACC at all times the ACC is operating above 1400°F. The ACC stack temperature shall be monitored continuously and shall be equipped with an alarm that indicates when the ACC stack temperature drops below 1400°F. If the alarm is tripped, the VOC emissions shall be vented to the ACC Bypass Stack and production of STB shall be in accordance with the rate specified in Requirement 7.1.6.b.
[45CSR14, R14-0001, A.4]

7.1.5. The average solvent application temperature shall not exceed 50°F during any eight (8) hour shift in which solvent is being fed to the curtain coater. Solvent application temperature shall be monitored and recorded hourly during each shift. If the curtain coater is operated for less than eight (8) hours during the shift, only the actual hours of curtain coater operation shall be considered in determining the average temperature. **[45CSR14, R14-0001, A.5]**

7.1.6. STB production shall be limited to the following hourly rates:

a. 20 tons per hour when the VOC emissions from the sources listed in Requirement 7.1.1 are vented to the ACC;

b. 13 tons per hour when the VOC emissions from the sources listed in Requirement 7.1.1 are vented to the ACC Bypass Stack.
[45CSR14, R14-0001, A.6]

7.1.7. STB production shall not exceed 64,000 tons in any calendar year. Maximum allowable STB production will vary between 23,860 TPY and 64,000 TPY, depending on ACC availability, so the total VOC emissions from the STB process do not exceed the maximum rate specified in requirement 7.1.3. **[45CSR14, R14-0001, A.7]**

7.1.8. The ACC shall provide a 95% destruction efficiency for the STB process emissions specified in Requirement 7.1.1.
[45CSR14, R14-0001, A.8]

7.1.9. All vent stacks shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures.
[45CSR§7-4.12 and 45CSR14, R14-0001, B.3]

7.1.10. The control devices in the Emission Units Table 1.0. for the STB process shall be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions. **[45CSR§30-12.7]**

7.1.11. The permittee shall inspect all control systems, specified in the Emission Units Table 1.0 for the STB process, weekly to ensure that they are operated and maintained in conformance with their designs. **[45CSR§30-5.1.c]**

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

7.2. Monitoring Requirements

7.2.1. The ACC stack temperature monitoring per Requirement 7.1.4.

7.2.2. Solvent application temperature monitoring per Requirement 7.1.5.

7.2.3. Visible emissions monitoring shall be performed per Requirement 3.2.1. Quarterly Method 22 checks shall be conducted for all the emission points and units listed in Emission Units Table 1.0 under Solvent Treated Briquet Production (except ACC Stack S-01-01, see requirement 5.2.4). For ACC Bypass Stack (S-04) visible emission checks shall be performed during periods when this stack is in use. Anytime when not in compliance with the opacity limit per 45CSR§7-3.1, then for this emission point monitoring shall revert to a weekly frequency requirement and begin the progressive monitoring cycle again as follows:

1. Weekly Method 22 checks shall be conducted for a minimum of 6 consecutive weeks for all the emission points and units listed in Emission Units Table 1.0 under Solvent Treated Briquet Production (except ACC Stack S-01-01, see requirement 5.2.4).

2. If in compliance, then monthly Method 22 checks shall be conducted for a minimum of 4 consecutive months.

3. If in compliance, then quarterly Method 22 checks shall be conducted.

A record of each visible emission check required above shall be maintained on site and shall be made available to the Director or his/her duly authorized representative upon request. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR§30-5.1.c]

7.2.4. Each opacity evaluation observation per 45CSR§ 7A-2.1.a, b as per Requirement 3.2.1 shall be a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) without averaging of results, unless any one single reading is greater than the opacity limit for the emission unit, in which case the observation period shall be extended to a 60 minutes or until a violation of the emissions standard per 45CSR§7-3.2 has been documented (more than twenty (20) single opacity readings are in excess of 20% opacity, but less than 40% opacity, or any single reading is equal or in excess of 40% opacity); whichever is the shorter period.
[45CSR§30-5.1.c]

7.2.5. Compliance with the hourly VOC emission limits in Section 7.1.2 will be demonstrated by demonstrating compliance with the requirements of Sections 7.1.5 and 7.1.6.
[45CSR§30-5.1.c]

7.2.6. The permittee shall conduct weekly inspections of the two (2) STB fume dampers in order to verify that they are being operated in accordance with permit condition 7.1.4. A record of each inspection required above shall be maintained on site for a period of at least 5 years and shall be made available to the Director or his/her duly authorized representative upon request.
[45CSR§30-5.1.c]

7.2.7**.** The permittee shall maintain a flow sensing device in the STB fume ductwork between last flow control damper and the inlet to the ACC. This device shall indicate presence of flow on the control screen in the control room and shall alarm to notify operators when the flow to the ACC is not present in accordance with permit condition 7.1.4 (where the ACC is operating above 1400°F). In the event when the flow is not present corrective actions should be taken, and records should be created to document it. Such records shall be maintained on site for a period of at least 5 years and shall be made available to the Director or his/her duly authorized representative upon request.
[45CSR§30-5.1.c]

7.3. Testing Requirements

7.3.1. The permittee shall conduct stack testing on emission point 19A (ACC vent stack S-01-01). Such testing shall be conducted during briquet production both with and without venting of volatile organic compounds to the ACC from the curtain coater, clean solvent feed tank, sump, product out feed conveyor, transfer conveyor, packaging surge bin, and screener for the purpose of establishing baseline emission. Such test shall be conducted once per Permit term within one year of the Permit issuance or renewal. In lieu of this test the permittee may conduct ACC stack testing as per Requirement 3.3.3. If compliance with more stringent VOC emission limit in Requirement 4.1.3 is demonstrated, then compliance with VOC limit for emission point 19A in 7.1.3 will be demonstrated.

The permittee shall submit a test protocol to the West Virginia Office of Air Quality (DAQ) not less than thirty (30) days prior to testing and shall notify the DAQ in writing of the date and time of stack testing not less than fifteen (15) days prior to such testing. Test methods 1, 2, 3, 4, and 25 or 25A (refer to Appendix A of 40 CFR 60) shall be utilized. The Director may require an equivalent method or approve such equivalent method if proposed by the permittee.
[45CSR§30-5.1.c]

7.3.2. Results from testing per Requirement 7.3.1 shall be submitted to the Director within sixty (60) days from the date of completion of said testing. The test shall demonstrate that the tested units can operate at the maximum processing rate specified in Requirement 7.1.6 in compliance with the emissions limits set forth in Requirements 7.1.2 and 7.1.3.
[45CSR§30-5.1.c]

7.4. Recordkeeping Requirements

7.4.1. The permittee shall demonstrate compliance with the VOC emission limitation established under

Requirement 7.1.3 by use of the VOC emission factors in accordance with Attachment 1 of Permit R14-0001 (Attached to the Title V Permit). The DAQ Director shall not be precluded from requiring or using alternative compliance verification methods including the use of standard tank loss equations, fugitive emissions factors, stack test results, or other similar methods.
[45CSR14, R14-0001, B.1]

7.4.2. Records required under Requirements 7.1.5 and 7.1.6 shall be maintained on-site and be readily accessible to DAQ staff to demonstrate compliance with the conditions of this permit. Each record shall be certified by the plant manager to be true and accurate. The records shall be maintained for a minimum of five (5) years and be made available to the Director or his authorized representative upon request. **[45CSR14, R14-0001, B.5]**

7.4.3. STB production shall be monitored and recorded during each shift to provide the tons of STB produced and hours of operation when VOC emissions are vented to the ACC or to the ACC Bypass Stack. **[45CSR14, R14-0001, A.6]**

7.4.4. Compliance with the hourly maximum processing rates listed in Requirement 7.1.6. shall be calculated on the basis of a rolling 30-day average expressed in tons per hour based on the hours of operation as per Requirement 7.4.3 for any specific 30-day period. Compliance with the yearly maximum processing rate specified in Requirement 7.1.7 shall be determined using rolling yearly totals. A rolling yearly total shall mean the sum of material processed, in tons, at the end of each month for that month and the previous 11 months.
[45CSR§30-5.1.c]

7.4.5. Visible emission checks recordkeeping as per Requirement 7.2.3.

7.5. Reporting Requirements

7.5.1. The permittee shall submit a report to the DAQ following each calendar quarter providing the following information:

a. The results of the quarterly VOC emission factor calculations in accordance with Attachment 1;
b. A report of any exceedences of the solvent application operating temperature limit established in Requirement 7.1.5. The date, shift, and average temperature shall be reported for all eight (8) hour shifts during which an exceedence of the temperature limit occurred. If there were no exceedences of the operating temperature limit, the report shall so state and shall indicate that hourly temperatures were recorded for all operating periods during the quarter;
c. STB hourly production rates for both conditions when the emission sources specified in Requirement 7.1.1 were vented to the ACC and to the ACC Bypass Stack.

The report shall be submitted to the DAQ within thirty (30) days following the end of each calendar quarter.

[45CSR14, R14-0001, B.2]

7.5.2. Opacity exceedance reporting as per requirement 3.5.8.a.1.

7.6. Compliance Plan

7.6.1. N/A

Are you in compliance with all applicable requirements for this emission unit? _X__Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
E-06-01 through 09 E06-0A, 0C, 0E 0F	Minors Ingredients Batching System/Dry Storage See Attachment D	E-06-05 through 09, 0A, 0C Fabric Filter Dust Collectors E-06-05 Wet Scrubber E-06-0E Vent E-06-0F Wet Scrubber

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
The char and other raw materials are mixed with a starch binder to form charcoal briquets in the briquetting operations. These briquet manufacturing operations include minor ingredients storage, batching, starch cooking, raw material mixing, mulling, and briquet pressing operations. After being pressed, the wet "green" briquets are transferred via belt conveyors to one of two briquet dryers.

Manufacturer:	**Model number:**	**Serial number:**
Not applicable	Not applicable	Not applicable

Construction date:	**Installation date:**	**Modification date(s):**
See Attachment D	See Attachment D	See Attachment D

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
See Attachment D

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
See Attachment D	See Attachment D	8,760 hours/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes X No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: Not applicable	**Type and Btu/hr rating of burners:** Not applicable

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Not applicable

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Not applicable			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(Per Title V Operation Permit No. R30-09300004-2019MM02)

8.0 Minors Ingredients Batching System/Dry Storage and Briquet Handling Requirements

8.1. Limitations and Standards

8.1.1. Emissions of particulate matter from the starch, nitrate and borax mixing tanks (Source ID E-06-0F) shall be vented to the 99.5% efficiency wet scrubber (C-21). Emissions from the scrubber shall not exceed 0.2 lb/hr of PM (Emission Point S-23).
[45CSR13, R13-1608, 4.1.10]

8.1.2. The control devices in the Emission Units Table 1.0. for the Minors Ingredients Batching System, Dry Storage and Briquet Handling shall be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions.
[45CSR§30-5.1.c] *(Emission Points S-10, S-11, S-13, S-14, S-17)*

8.1.3. Emissions of particulate matter from the Briquet Handling Operations shall be limited to the following:

Emission Point ID	Description	Pollutant	Maximum Allowable Emissions (lbs/hr)
S-06	Briquet Dryer Discharge Conveyors	PM/ PM_{10}	30.4
S-07	Briquet Packaging Lines	PM/ PM_{10}	32.0
S-08	Finished Briquet Handling Lines	PM/ PM_{10}	32.0

[45CSR§7-4.1]

8.1.4. The briquet handling operations pertaining to the Packaging Scale Bin In -feed, which is identified as
Emission Unit E-08-03H, shall be limited to the following limitations:

a. Emissions of particulate matter and particulate matter less than 10 micros (PM_{10}) from Emission Point
S-35 shall not exceed 0.73 pounds per hour.

b. Visible emission from Emission Point S-35 shall not exceed 20% opacity.

c. There is no annual operational restriction or limitation for the Packing Scale Bin In -feed system.

Compliance with these streamlined visible emissions limit and the PM and PM_{10} limits will ensure compliance with 45CSR§§7-3.1 & 4.1.

[45CSR13, R13-1608, 4.1.13]

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

8.2. Monitoring Requirements

8.2. Monitoring Requirements

8.2.1. In order to demonstrate compliance with the emission limits specified in Requirement 8.1.1 the permittee shall daily monitor flow rate of the Wet Scrubber (C-21) when it is in operation and maintain it at or above
3 gpm during normal operations. An alarm, inspection, corrective actions (if necessary) and recordkeeping per Requirement 8.4.1 are triggered if flow rate drops below 3 gpm.
[45CSR§§30-5.1.c and 12.7

8.2.2. **CAM monitoring requirement**. The permittee shall maintain a pressure gauge on all Fabric Filter Dust Collector for pressure drop observations. The permittee shall maintain records of the maintenance performed on each fabric filter and pressure gauges. These records shall include all maintenance work performed on each fabric filter including the frequency of bag/filter change outs. Records shall state the date and time of each fabric filter inspection, the inspection results, and corrective action taken, if any. Records shall be maintained on site as per Requirement 3.4.2. The differential pressure drop across each of the three fabric filters compartments (C-01, C-02 and C-03, Emission Points S-06, S-07 and S-08,) shall be monitored at least once daily. Records shall be kept on site with entries based on indicator gauge readings. The indicator gauges, mounted on each Fabric Filter Dust Collector compartment, shall be examined to ensure they are functioning properly. Minimum acceptable accuracy of pressure gauges is $\pm$ 2% of the full range. Readings should be averaged on a daily basis. A daily average pressure drop outside of the following range is considered an excursion:

Emission Point ID	Description	Control Device ID	CAM pressure drop range (in of H_2O)
S-06	Briquet Dryer Discharge Conveyors	C-01	2-10.5
S-07	Briquet Packaging Lines	C-02	1-5.5
S-08	Finished Briquet Handling Lines	C-03	2-12

If an excursion occurs, corrective action, if necessary, shall be taken as expeditiously as practicable in
accordance with good air pollution control practices for minimizing emissions, and recordkeeping and reporting shall be initiated.**[45CSR§§30-5.1.c and 12.7, and 40C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2)]**

8.2.3. Visible emissions monitoring for Dry Storage tanks or their control devices (if any) with exhaust stacks located outdoors (Emission Points S-10 through S-17) shall be performed per Requirement 3.2.1. Upon beginning of normal operations weekly Method 22 checks shall be conducted at the time of each tank loading/unloading operations for a minimum of 6 consecutive weeks for all the emission points listed above. If in compliance, then monthly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.7, then corrective actions shall be taken immediately, and monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the

check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR13, R13-1608, 4.2.2 and 45CSR§30-5.1.c]

8.2.4. Visible emissions monitoring for Minors Ingredients Batching System and Briquet Handling emission points or their control devices (if any) with exhaust stacks located outdoors (Emission Points S-06, S-07, S-08, S-22 and S-23) shall be performed per Requirement 3.2.1. Upon beginning of normal operations weekly Method 22 checks shall be conducted for a minimum of 6 consecutive weeks for all the emission points listed above. If in compliance, then monthly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.1, then monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR13, R13-1608, 4.2.2 and 45CSR§30-5.1.c

8.2.5. Each opacity evaluation observation per 45CSR§7A-2.1.a,b (as per Requirement 3.2.1) for Emission Points listed in Requirement 8.2.4. shall be a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) without averaging of results, unless any one single reading is greater than the opacity limit for the emission unit, in which case the observation period shall be extended to a 60 minutes or until a violation of the emissions standard per 45CSR§7-3.2 has been documented. (more than twenty (20) single opacity readings are in excess of 20% opacity, but less than 40% opacity, or any single reading is equal or in excess of 40% opacity); whichever is the shorter period.**[45CSR§30-5.1.c]**

8.2.6. Compliance with the particulate matter and visible emission requirements as set forth in condition 8.1.4, (*Emission Unit EU-08-03H*) shall be determined by conducting daily Method 22-like visible emission checks. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40 C.F.R. Part 60, Appendix A, Method 22 or from the lecture portion of the 40 C.F.R. Part 60, Appendix A, Method 9 certification course.

The visible emission check shall be performed during periods of facility operation at least once per day during daylight hours and appropriate weather conditions for a sufficient time interval to determine if any visible emissions are present.

If visible emissions are present during these checks or at any other time, visible emissions evaluations in accordance with 45CSR§§7A-2.1.a and 2.1.b shall be conducted immediately. Such evaluations shall not be required if the visible emissions condition is corrected as expeditiously as possible and the cause and corrective measures taken are recorded. The 45CSR7A evaluations shall be conducted during periods of facility operations **[45CSR§30-5.1.c, 45CSR§7A-2.1]**

8.3. Testing Requirements

8.3.1. N/A

8.4. Recordkeeping Requirements

8.4.1. Keep records of the scrubber C-21 flow rate on daily basis when the scrubber is in operation, and also of date and time when flow rate drops below 3 gpm during normal operations, and of the inspection and corrective actions taken (if any) as per Requirement 8.2.1.
[45CSR§30-5.1.c]

8.4.2. Visible emission checks recordkeeping as per Requirements 8.2.3 and 8.2.4.

8.4.3. General Recordkeeping Requirements for 40 C.F.R. Part 64 (CAM)

(1) The differential pressure per Requirement 8.2.2 shall be recorded daily.

(2) The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

Are you in compliance with all applicable requirements for this emission unit? _X__Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
007-01	Natural Gas Burners	ACC

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
The ACC is equipped with a 50 MMBtu burner to temperatures in the afterburner of at least 1600°~~e~~F. Heat for the wood and briquet dryers and a waste heat boiler is usually provided by the ACC. However, the wood dryer is equipped with a 43 MMBtu burner, the briquet dryers are equipped with an 83 MMBtu/hr burner, and the waste heat boiler is equipped with a 7.83 MMBtu boiler in the event that the ACC is not in operation. The retort is equipped with four (4) 2.0 MMBtu burners to provide heat during startup.

Manufacturer:	**Model number:**	**Serial number:**
See Attachment D	See Attachment D	Not determined

Construction date:	**Installation date:**	**Modification date(s):**
See Attachment D	See Attachment D	See Attachment D

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
See Attachment D

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
See Attachment D	See Attachment D	8,760 hours/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _X__Yes No	**If yes, is it** ___ Indirect Fired ___Direct Fired Boiler –indirect ACC/Wood dryer/retort/briquet dryers - direct
Maximum design heat input and/or maximum horsepower rating: See Attachment D	**Type and Btu/hr rating of burners:** See Attachment D

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Natural gas

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural gas	Not applicable	Not applicable	1,020 Btu/scf

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(Per Title V Operation Permit No. R30-09300004-2019MM02)

10.0 Waste Heat Boiler Requirements

10.1. Limitations and Standards

10.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average. **[45CSR§2-3.1]**

10.1.2. The visible emission standards set forth in section 3 of 45CSR2 shall apply at all times except in periods of start-ups, shutdowns and malfunctions. Where the Director believes that start-ups and shutdowns are excessive in duration and/or frequency, the Director may require an owner or operator to provide a written report demonstrating that such frequent start-ups and shutdowns are necessary.**[45CSR§2-9.1]**

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

10.2. Monitoring Requirements

10.2.1. Weekly Method 22 checks shall be conducted for a minimum of 6 consecutive weeks for the Waste Heat Boiler. If in compliance, then monthly Method 22 checks shall be conducted for a minimum of 4 consecutive months. If in compliance, then quarterly Method 22 checks shall be conducted. These checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix A, Method 9 or Method 22, during periods of operation of emission sources that vent from the referenced emission point for a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 40 C.F.R. 60, Appendix A, Method 9 within seventy-two (72) hours of the first signs of visible emissions. A 40 C.F.R. 60, Appendix A, Method 9 evaluation shall not be required if the visible emission condition is corrected within seventy-two (72) hours after the visible emission and the sources are operating at normal conditions. Anytime when not in compliance with the opacity limit per 45CSR§2-3.1, then for this emission point monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again.

A record of each visible emission check required above shall be maintained on site for a period of no less than five (5) years and shall be made available to the Director or his/her duly authorized representative upon request. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.

[45CSR§30-5.1.c]

10.3. Testing Requirements

10.3.1. N/A

10.4. Recordkeeping Requirements

10.4.1. Visible emission checks recordkeeping as per requirement 10.2.1.

10.5. Reporting Requirements

10.5.1. Opacity exceedance reporting as per requirement 3.5.8.a.1.

Are you in compliance with all applicable requirements for this emission unit? _X__Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
008-01, 02A, 02B, 03A through 03H	Briquet Handling	Fabric Filter Dust Collectors (C-01 through C-03, C-35)

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Four dust collectors (C-01, 02, 03 and C-35) provide control of particulate matter emissions associated with briquet handling and packaging from the outlet of the briquet coolers through the packaging of briquets into bags for shipment.

Manufacturer:	**Model number:**	**Serial number:**
See Attachment D	See Attachment D	Not determined
Construction date:	**Installation date:**	**Modification date(s):**
See Attachment D	See Attachment D	See Attachment D

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
154,000 tons briquets/yr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
Not determined	154,000 tons briquets/yr	8,760 hr/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes _X__ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: Not applicable	**Type and Btu/hr rating of burners:** Not applicable

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Not applicable

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Not applicable			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(Per Title V Operation Permit No. R30-09300004-2019MM02)

See 006-01 through 09 and 006-0A through 0F requirements

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See 006-01 through 09 and 006-0A through 0F requirements

Are you in compliance with all applicable requirements for this emission unit? _X__Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
009-01, 02	E-09-01 Paved Plant Roads E-09-02 Unpaved Plant Roads	None

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Raw and finished materials are transported into, out of, and through the plant via plant roads. The majority of the roads are paved, however some areas (e.g. trailer parking lots) remain unpaved.

Manufacturer:	**Model number:**	**Serial number:**
Not applicable	Not applicable	Not applicable

Construction date:	**Installation date:**	**Modification date(s):**
E-09-01 Various E-09-02 1958	E-09-01 Various E-09-02 1958	Various

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
Not applicable

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
Not applicable	Not applicable	8,760 hours/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes _X__ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: Not applicable	**Type and Btu/hr rating of burners:** Not applicable

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Not applicable

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Not applicable			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.
(Per Title V Operation Permit No. R30-09300004-2019MM02)

See E-01-01,02 requirements

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See E-01-01,02 requirements

Are you in compliance with all applicable requirements for this emission unit? _X__Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 00A-01, 02, 03, 08	**Emission unit name:** Liquid Storage	**List any control devices associated with this emission unit.** E-0A-01, 02 Conservation Vent E-0A-03, 08 Vent

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
KMC stores liquid materials such as fuel and lubricants in bulk storage tanks throughout the facility.

Manufacturer: Not determine	**Model number:** Not determined	**Serial number:** Not determined
Construction date: See Attachment D	**Installation date:** See Attachment D	**Modification date(s):** See Attachment D

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
See Attachment D

Maximum Hourly Throughput: Not applicable	**Maximum Hourly Throughput:** Not applicable	**Maximum Hourly Throughput:** Not applicable

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes _X__ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: Not applicable	**Type and Btu/hr rating of burners:** Not applicable

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Not applicable

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Not applicable			

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

For ~~10,000~~ 500 gallon Gasoline Storage Tank (E-0A-01):

40 CFR 63 Subpart CCCCCC - Gasoline Distribution NESHAP

Gasoline throughput limited to less than 10,000 gallons per month. (40 CFR 63.111111)

Maintain the source in accordance with good operating practices. (40 CFR 63.11116)

(a) You must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

(1) Minimize gasoline spills;

(2) Clean up spills as expeditiously as practicable;

(3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;

(4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

…..

(c) You must comply with the requirements of this subpart by the applicable dates specified in § 63.11113.

(d) Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with paragraph (a)(3) of this section.

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating

compliance. If there is not already a required method in place, then a method must be proposed.)

For ~~10,000~~ 500 gallon Gasoline Storage Tank (E-0A-01):

40 CFR 63 Subpart CCCCCC - Gasoline Distribution NESHAP

(40 CFR 63.111111)

(e) An affected source shall, upon request by the Administrator, demonstrate that their monthly throughput is less than the 10,000-gallon or the 100,000-gallon threshold level, as applicable. For new or reconstructed affected sources, as specified in § 63.11112(b) and (c), recordkeeping to document monthly throughput must begin upon startup of the affected source. For existing sources, as specified in § 63.11112(d), recordkeeping to document monthly throughput must begin on January 10, 2008. For existing sources that are subject to this subpart only because they load gasoline into fuel tanks other than those in motor vehicles, as defined in § 63.11132, recordkeeping to document monthly throughput must begin on January 24, 2011. Records required under this paragraph shall be kept for a period of 5 years.

(40 CFR 63.11116)

(b) You are not required to submit notifications or reports as specified in § 63.11125, § 63.11126, or subpart A of this part, but you must have records available within 24 hours of a request by the Administrator to document your gasoline throughput.

Are you in compliance with all applicable requirements for this emission unit? _X__Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: E-0B-01	**Emission unit name:** Emergency Equipment	**List any control devices associated with this emission unit.**

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
KMC maintains four (4) 2500 gpm emergency flood pumps to dewater the area inside the plant levees in the event of flooding. The pumps are diesel-fired.

Manufacturer: Not determined	**Model number:** Not determined	**Serial number:** Not determined
Construction date: 1998	**Installation date:** 1998	**Modification date(s):** Not Applicable

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
2500 gpm

Maximum Hourly Throughput: Not determined	**Maximum Annual Throughput:** Not determined	**Maximum Operating Schedule:** 500 hr/yr/pump

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _X__Yes ___ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: 115 hp/pump	**Type and Btu/hr rating of burners:** Not applicable

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Diesel fuel

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Diesel fuel	500 ppm	Not determined	~140,000 btu/gal

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

See E-0B-02

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See E-0B-02

Are you in compliance with all applicable requirements for this emission unit? _X__Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
FP-2	South Fire Pump	None

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
#2 Fuel Oil Fired Fire Pump

Manufacturer:	**Model number:**	**Serial number:**
Clarke Fire Protection Products	JXGH-UF30	RG6125A016204

Construction date:	**Installation date:**	**Modification date(s):**
07/01/2008	09/01/2008	NA

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
22 gallons fuel/hr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
22 gal fuel/hr	11,000 gal/yr	<500 hrs/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? __X_Yes ___ No	**If yes, is it?** ___ Indirect Fired _X_Direct Fired
Maximum design heat input and/or maximum horsepower rating: 420 bhp @ 1760 rpm	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

#2 Fuel Oil, 22 gal/hr, 11,000 gal/yr

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
#2 Fuel Oil	500 ppm		143,000 btu/gal

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

See E-0B-02

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See E-0B-02

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 0B-02	**Emission unit name:** Emergency Generator (E-0B-02)	**List any control devices associated with this emission unit.** Catalyst integral to exhaust
Provide a description of the emission unit (type, method of operation, design parameters, etc.): 150kW Natural Gas Fired Emergency Generator		
Manufacturer: Kohler Power Systems	**Model number:** 150REZGB	**Serial number:** TBD
Construction date: 09/04/2012	**Installation date:** 09/21/2012	**Modification date(s):** NA
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 1930 ft3/hr Natural Gas Consumption		
Maximum Hourly Throughput: 1930 ft3/hr Natural Gas Consumption	**Maximum Annual Throughput:** 0.193 $MMft^3$/yr Natural Gas Consumption for non-emergency use (assumes 100 hrs/yr operation)	**Maximum Operating Schedule:** <100 hrs/yr non-emergency use

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? __X_ Yes ___ No	**If yes, is it?** ___ Indirect Fired _X_ Direct Fired
Maximum design heat input and/or maximum horsepower rating: 228 bhp @ 1800 rpm	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Natural Gas, 1930 ft3/hr, 0.193 $MMft^3$/yr during non-emergency use

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	1.45 gr/100 scf		1,020 btu/scf

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	See Appendix B	
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Appendix B

Applicable Requirements
List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

11.0 Diesel Fire Pump and Emergency Generator Requirements

11.1. Limitations and Standards

11.1.1. The permittee is authorized to operate the Diesel Fire Pump FP-2 (Emission Point S-33) and the Emergency Generator E-0B-02 (Emission Point S-36) with following emission limits in accordance with all terms and conditions of the 45CSR13 G60-D Class II General Permit:

Source ID#	Nitrogen Oxides		Carbon Monoxide		Volatile Organic Compounds	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
FP-2	6.15	1.54	0.45	0.11	0.09	0.02
E-0B-02	0.06	0.01	0.16	0.01	0.06	0.01

[45CSR13, G60-C012 General Permit Registration, Emission Limitations and G60-D, 5.1.2]

11.1.2. The internal combustion engine powering the emergency generator (E-0B-02) must meet the requirements of 40 C.F.R. 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. 60 Subpart JJJJ for spark ignition engines. No further requirements apply for such engines under 40 C.F.R. 63 Subpart ZZZZ.

§60.4233 What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?

(e) Owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to this subpart for their stationary SI ICE. For owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 100 HP (except gasoline and rich burn engines that use LPG) manufactured prior to January 1, 2011 that were certified to the certification emission standards in 40 CFR part 1048 applicable to engines that are not severe duty engines, if such stationary SI ICE was certified to a carbon monoxide (CO) standard above the standard in Table 1 to this subpart, then the owners and operators may meet the CO certification (not field testing) standard for which the engine was certified.

Table 1 to Subpart JJJJ of Part 60—NO_X, CO, and VOC Emission Standards for Stationary Emergency Engines >25 HP

Engine type and fuel	Maximum engine power	Manufacture date	Emission standards[a]					
			g/HP-hr			ppmvd at 15% O_2		
			NO_X	CO	VOC[d]	NO_X	CO	VOC[d]
Emergency	HP≥130	1/1/2009	2.0	4.0	1.0	160	540	86

[a]Owners and operators of stationary non-certified SI engines may choose to comply with the emission standards in units of either g/HP-hr or ppmvd at 15 percent O_2.

[d]For purposes of this subpart, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

§60.4234 How long must I meet the emission standards if I am an owner or operator of a stationary SI internal combustion engine?

Owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in §60.4233 over the entire life of the engine.

§60.4243 What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?

(a) If you are an owner or operator of a stationary SI internal combustion engine that is manufactured after July 1, 2008, and must comply with the emission standards specified in §60.4233(a) through (c), you must comply by purchasing an engine certified to the emission standards in §60.4231(a) through (c), as applicable, for the same engine class and maximum engine power. In addition, you must meet one of the requirements specified in (a)(1) and (2) of this section.

(1) If you operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, you must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required if you are an owner or operator. You must also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply to you. If you adjust engine settings according to and consistent with the manufacturer's instructions, your stationary SI internal combustion engine will not be considered out of compliance.

(2) If you do not operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer's emission-related written instructions, your engine will be considered a non-certified engine, and you must demonstrate compliance according to (a)(2)(i) through (iii) of this section, as appropriate.

(ii) If you are an owner or operator of a stationary SI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test within 1 year of engine startup to demonstrate compliance.

(b) If you are an owner or operator of a stationary SI internal combustion engine and must comply with the emission standards specified in §60.4233(d) or (e), you must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) and (2) of this section.

(1) Purchasing an engine certified according to procedures specified in this subpart, for the same model year and demonstrating compliance according to one of the methods specified in paragraph (a) of this section.

(d) If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (d)(1) through (3) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (d)(1) through (3) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (d)(1) through (3) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary ICE in emergency situations.

(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (d)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (d)(3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (d)(2).

(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

(ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (d)(2) of this section. Except as provided in paragraph (d)(3)(i) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

11.0 Diesel Fire Pump and Emergency Generator Requirements

11.1. Limitations and Standards

11.1.1. The permittee is authorized to operate the Diesel Fire Pump FP-2 (Emission Point S-33) and the Emergency Generator E-0B-02 (Emission Point S-36) with following emission limits in accordance with all terms and conditions of the 45CSR13 G60-D Class II General Permit:

Source ID#	Nitrogen Oxides		Carbon Monoxide		Volatile Organic Compounds	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
FP-2	6.15	1.54	0.45	0.11	0.09	0.02
E-0B-02	0.06	0.01	0.16	0.01	0.06	0.01

[45CSR13, G60-C012 General Permit Registration, Emission Limitations and G60-D, 5.1.2]

11.1.2. The internal combustion engine powering the emergency generator (E-0B-02) must meet the requirements of 40 C.F.R. 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. 60 Subpart JJJJ for spark ignition engines. No further requirements apply for such engines under 40 C.F.R. 63 Subpart ZZZZ.

§60.4233 What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?

(e) Owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to this subpart for their stationary SI ICE. For owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 100 HP (except gasoline and rich burn engines that use LPG) manufactured prior to January 1, 2011 that were certified to the certification emission standards in 40 CFR part 1048 applicable to engines that are not severe duty engines, if such stationary SI ICE was certified to a carbon monoxide (CO) standard above the standard in Table 1 to this subpart, then the owners and operators may meet the CO certification (not field testing) standard for which the engine was certified.

Table 1 to Subpart JJJJ of Part 60—NO_X, CO, and VOC Emission Standards for Stationary Emergency Engines >25 HP

Engine type and fuel	Maximum engine power	Manufacture date	Emission standards[a]					
			g/HP-hr			ppmvd at 15% O_2		
			NO_X	CO	VOC[d]	NO_X	CO	VOC[d]
Emergency	HP≥130	1/1/2009	2.0	4.0	1.0	160	540	86

[a]Owners and operators of stationary non-certified SI engines may choose to comply with the emission standards in units of either g/HP-hr or ppmvd at 15 percent O_2.

[d]For purposes of this subpart, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

11.1.7. Requirements for Use of Catalytic Reduction Devices

a. Rich-burn engine(s) equipped with non-selective catalytic reduction (NSCR) air pollution control devices shall be fitted with a closed-loop, automatic air/fuel ratio controller to ensure emissions of regulated pollutants do not exceed the emission limit listed in the General Permit Registration for any engine/NSCR combination under varying load. The closed-loop, automatic air/fuel ratio controller shall control a fuel metering valve to ensure a fuel-rich mixture and a resultant exhaust oxygen content of less than or equal to 2%.

b. Lean-burn engine(s) equipped with selective catalytic reduction (SCR) air pollution control devices shall be fitted with a closed-loop automatic feedback controller to ensure emissions of regulated pollutants do not exceed the emission limit listed in the General Permit Registration for any engine/SCR combination under varying load. The closed-loop automatic feedback controller shall provide proper and efficient operation of the engine, ammonia injection and SCR device, monitor emission levels downstream of the catalyst element and limit ammonia slip to less than 10 ppm_v

c. Lean-burn engine(s) equipped with oxidation catalyst air pollution control devices shall be fitted with a closed-loop automatic air/fuel ratio feedback controller to ensure emissions of regulated pollutants do not exceed the emission limit listed in the General Permit Registration for any engine/oxidation catalyst combination under varying load. The closed-loop, automatic air/fuel ratio controller shall control a fuel metering valve to ensure a lean-rich mixture.

d. For engine(s) equipped with a catalyst, the registrant shall monitor the temperature to the inlet of the catalyst and in accordance with manufacturer's specifications; a high temperature alarm shall shut off the engine before thermal deactivation of the catalyst occurs. If the engine shuts off due to high temperature, the registrant shall also check for thermal deactivation of the catalyst before normal operations are resumed.

e. The registrant shall follow a written operation and maintenance plan that provides the periodic and annual maintenance requirements.

[45CSR13, G60-C012 General Permit Registration & G60-D, 5.1.5]

11.1.8. The emission limitations specified in section 11.1.1 shall apply at all times except during periods of start-up and shut-down provided that the duration of these periods does not exceed 30 minutes per occurrence. The registrant shall operate the engine in a manner consistent with good air pollution control practices for minimizing emissions at all times, including periods of start-up and shut-down. The emissions from start-up and shut-down shall be included in the twelve (12) month rolling total of emissions. The registrant shall comply with all applicable start-up and shut-down requirements in accordance with 40 CFR Part 60, Subparts IIII, JJJJ and 40 CFR Part 63, Subpart ZZZZ.
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.1.7]

11.2. Monitoring Requirements

11.2.1. Catalytic Reduction Devices

a. The registrant shall regularly inspect, properly maintain and/or replace catalytic reduction devices and auxiliary air pollution control devices to ensure functional and effective operation of the engine's physical and operational design. The registrant shall ensure proper operation, maintenance and performance of catalytic reduction devices and auxiliary air pollution control devices by:

1. Maintaining proper operation of the automatic air/fuel ratio controller or automatic feedback controller.

2. Following the catalyst manufacturer emissions related operating and maintenance recommendations, or develop, implement, or follow a site-specific maintenance plan.

[45CSR13, G60-C012 General Permit Registration & G60-D, 5.2.1]

11.2.2. Pursuant to 40 CFR 60 Subpart IIII *Standards Of Performance for Stationary Compression Ignition Internal Combustion Engines*, Diesel Fire Pump FP-2 is subject to the following monitoring requirements given below:

§60.4209 What are the monitoring requirements if I am an owner or operator of a stationary CI internal combustion engine?

If you are an owner or operator, you must meet the monitoring requirements of this section. In addition, you must also meet the monitoring requirements specified in 40 CFR §60.4211.

(a) If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.

[45CSR16, 40 CFR 60 Subpart IIII §60.4209(a); 45CSR13, G60-C012 General Permit Registration & G60-D, 5.1.6]

11.2.3. Pursuant to 40 CFR 60 Subpart JJJJ *Standards Of Performance for Stationary Spark Ignition Internal Combustion Engines*, emergency generator E-0B-02 is subject to the following monitoring requirements given below:

§60.4237 What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?

(b) Starting on January 1, 2011, if the emergency stationary SI internal combustion engine that is greater than or equal to 130 HP and less than 500 HP that was built on or after January 1, 2011, does not meet the standards applicable to non-emergency engines, the owner or operator must install a non-resettable hour meter.

[45CSR16, 40 CFR 60 Subpart JJJJ §60.4237(b); 45CSR13, G60-C012 General Permit Registration & G60-D, 5.1.6]

11.3. Testing Requirements

11.3.1. Pursuant to 40 CFR 60 Subpart IIII *Standards Of Performance for Stationary Compression Ignition Internal Combustion Engines*, Diesel Fire Pump FP-2 is subject to the following compliance and testing requirements given below:

§60.4211 What are my compliance requirements if I am an owner or operator of a stationary CI internal combustion engine?

(g) If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

(2) If you are an owner or operator of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

§60.4212 What test methods and other procedures must I use if I am an owner or operator of a stationary CI internal combustion engine with a displacement of less than 30 liters per cylinder?

Owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests pursuant to this subpart must do so according to paragraphs (a) through (e) of this section.

(a) The performance test must be conducted according to the in-use testing procedures in 40 CFR part 1039, subpart F, for stationary CI ICE with a displacement of less than 10 liters per cylinder, and according to 40 CFR part 1042, subpart F, for stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder.

(b) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1039 must not exceed the not-to-exceed (NTE) standards for the same model year and maximum engine power as required in 40 CFR 1039.101(e) and 40 CFR 1039.102(g)(1), except as specified in 40 CFR 1039.104(d). This requirement starts when NTE requirements take effect for nonroad diesel engines under 40 CFR part 1039.

(c) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8, as applicable, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112 or 40 CFR 94.8, as applicable, determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \cdot (\text{STD}) \quad \text{(Eq. 1)}$$

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112 or 40 CFR 94.8, as applicable.

Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8 may follow the testing procedures specified in §60.4213 of this subpart, as appropriate.

(d) Exhaust emissions from stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in §60.4204(a), §60.4205(a), or §60.4205(c), determined from the equation in paragraph (c) of this section.

Where:

STD = The standard specified for that pollutant in §60.4204(a), §60.4205(a), or §60.4205(c).

Alternatively, stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) may follow the testing procedures specified in §60.4213, as appropriate.

(e) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1042 must not exceed the NTE standards for the same model year and maximum engine power as required in 40 CFR 1042.101(c).

[45CSR16, 40 CFR 60 Subpart IIII §§60.4211(g)(2) and 60.4212; 45CSR13, G60-C012 General Permit Registration & G60-D, 5.4.1]

11.3.2. Pursuant to 40 CFR 60 Subpart JJJJ *Standards Of Performance for Stationary Spark Ignition Internal Combustion Engines*, emergency generator E-0B-02 is subject to the following testing requirements given below:

§60.4243 What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?

(e) Owners and operators of stationary SI natural gas fired engines may operate their engines using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of §60.4233.

[45CSR16, 40 CFR 60 Subpart JJJJ §60.4243(e); 45CSR13, G60-C012 General Permit Registration & G60-D, 5.4.1]

11.3.3. To demonstrate compliance with general permit section 5.1.5(a) (requirement 11.1.7.a), the registrant shall verify that the closed-loop, automatic air/fuel ratio controller shall control a fuel metering valve to ensure a fuel-rich mixture and a resultant exhaust oxygen content of less than or equal to 2% during any performance testing.
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.4.2]

11.4. Recordkeeping Requirements

11.4.1. To demonstrate compliance with condition 11.1.5, the registrant shall maintain records of the hours of operation of the emergency generator(s) on a monthly basis.
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.3.1]

11.4.2. To demonstrate compliance with section 11.1.6, the registrant shall maintain records of the maintenance performed on each emergency generator.
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.3.2]

11.4.3. To demonstrate compliance with requirement 11.2.1, the registrant shall maintain a copy of the site specific maintenance plan or manufacturer maintenance plan.
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.3.3]

11.4.4. Pursuant to 40 CFR 60 Subpart JJJJ *Standards Of Performance for Stationary Spark Ignition Internal Combustion Engines*, emergency generator E-0B-02 is subject to the following recordkeeping requirements given below:

§60.4245 What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?

Owners or operators of stationary SI ICE must meet the following notification, reporting and recordkeeping requirements.

(a) Owners and operators of all stationary SI ICE must keep records of the information in paragraphs (a)(1) through (4) of this section.

(1) All notifications submitted to comply with this subpart and all documentation supporting any notification.

(2) Maintenance conducted on the engine.

(3) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

(4) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards.

(b) For all stationary SI emergency ICE greater than or equal to 130 HP and less than 500 HP manufactured on or after July 1, 2011 that do not meet the standards applicable to non-emergency engines, the owner or operator of must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

[45CSR16, 40 CFR 60 Subpart JJJJ §§60.4245(a), (b); 45CSR13, G60-C012 General Permit Registration & G60-D, 5.3.4]

11.4.5. To demonstrate compliance with section 11.1.4. of this permit, the permittee shall maintain records documenting that engines E-0B-01 were relocated at the Kingsford Manufacturing Company Parsons Plant site at least once every twelve months. An example record could be a dated photograph taken in front of the engine showing the UTM or longitude/latitude coordinates of the equipment location.
[45CSR§30-12.7]

11.4.6. All records required by this section shall be maintained in accordance with section 3.5.1 of the general permit (requirement 3.4.2).
[45CSR13, G60-C012 General Permit Registration & G60-D, 5.3.5]

11.5. Reporting Requirements

11.5.1. Pursuant to 40 CFR 60 Subpart JJJJ *Standards Of Performance for Stationary Spark Ignition Internal Combustion Engines*, emergency generator E-0B-02 is subject to the following reporting requirements given below:

§60.4245 What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?

(e) If you own or operate an emergency stationary SI ICE with a maximum engine power more than 100 HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §60.4243(d)(2)(ii) and (iii) or that operates for the purposes specified in §60.4243(d)(3)(i), you must submit an annual report according to the requirements in paragraphs (e)(1) through (3) of this section.

(1) The report must contain the following information:

(i) Company name and address where the engine is located.

(ii) Date of the report and beginning and ending dates of the reporting period.

(iii) Engine site rating and model year.

(iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.

(v) Hours operated for the purposes specified in §60.4243(d)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in §60.4243(d)(2)(ii) and (iii).

(vi) Number of hours the engine is contractually obligated to be available for the purposes specified in §60.4243(d)(2)(ii) and (iii).

(vii) Hours spent for operation for the purposes specified in §60.4243(d)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in §60.4243(d)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

(2) The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

(3) The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (*www.epa.gov/cdx*). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in §60.4.

[45CSR16, 40 CFR 60 Subpart JJJJ §60.4245(e); 45CSR13, G60-C012 General Permit Registration & G60-D, 5.5.1]

11.6. Compliance Plan

11.6.1. N/A

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See above.

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT F
SCHEDULE OF COMPLIANCE FORM (NOT APPLICABLE)

ATTACHMENT G
AIR POLLUTION CONTROL DEVICE FORM

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-01 Fabric Filter Dust Collector	**List all emission units associated with this control device.** E-08-01 Briquet Dryer Discharge Conveyors	
Manufacturer: Pneumafil	**Model number:** 11.5-3168	**Installation date:** 1992

Type of Air Pollution Control Device:

_X_ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100	99+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
The briquet handling and packaging system is controlled by four (4) fabric filters (C-01 @ 15,000 cfm, C-02 @ 30,000 cfm, C-03 @ 25,000 cfm and C-35 @ 8,500 cfm).

Is this device subject to the CAM requirements of 40 C.F.R. 64? _X__ Yes ___ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.
See attached sheets

ATTACHMENT G - Air Pollution Control Device Form

Describe the parameters monitored and/or methods used to indicate performance of this control device. (Per Title V Operating Permit No. R30-0930004-2019MM02)

8.0 Minors Ingredients Batching System/Dry Storage and Briquet Handling Requirements

8.1. Limitations and Standards

8.1.1. Emissions of particulate matter from the starch, nitrate and borax mixing tanks (Source ID E-06-0F) shall be vented to the 99.5% efficiency wet scrubber (C-21). Emissions from the scrubber shall not exceed 0.2 lb/hr of PM (Emission Point S-23).
[45CSR13, R13-1608, 4.1.10]

8.1.2. The control devices in the Emission Units Table 1.0. for the Minors Ingredients Batching System, Dry Storage and Briquet Handling shall be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions.
[45CSR§30-5.1.c] *(Emission Points S-10, S-11, S-13, S-14, S-17)*

8.1.3. Emissions of particulate matter from the Briquet Handling Operations shall be limited to the following:

Emission Point ID	Description	Pollutant	Maximum Allow Emissions (lbs/
S-06	Briquet Dryer Discharge Conveyors	PM/ PM_{10}	30.4
S-07	Briquet Packaging Lines	PM/ PM_{10}	32.0
S-08	Finished Briquet Handling Lines	PM/ PM_{10}	32.0

[45CSR§7-4.1]

8.1.4. The briquet handling operations pertaining to the Packaging Scale Bin In -feed, which is identified as
Emission Unit E-08-03H, shall be limited to the following limitations:

a. Emissions of particulate matter and particulate matter less than 10 micros (PM_{10}) from Emission Point
S-35 shall not exceed 0.73 pounds per hour.

b. Visible emission from Emission Point S-35 shall not exceed 20% opacity.

c. There is no annual operational restriction or limitation for the Packing Scale Bin In -feed system.

Compliance with these streamlined visible emissions limit and the PM and PM_{10} limits will ensure compliance with 45CSR§§7-3.1 & 4.1

[45CSR13, R13-1608, 4.1.13]

ATTACHMENT G - Air Pollution Control Device Form

Describe the parameters monitored and/or methods used to indicate performance of this control device. (Per Title V Operating Permit No. R30-0930004-2019 MM02)

8.2. Monitoring Requirements

8.2.1. In order to demonstrate compliance with the emission limits specified in Requirement 8.1.1 the permittee shall daily monitor flow rate of the Wet Scrubber (C-21) when it is in operation and maintain it at or above
3 gpm during normal operations. An alarm, inspection, corrective actions (if necessary) and recordkeeping per Requirement 8.4.1 are triggered if flow rate drops below 3 gpm.
[45CSR§§30-5.1.c and 12.7]

8.2.2. **CAM monitoring requirement**. The permittee shall maintain a pressure gauge on all Fabric Filter Dust Collector for pressure drop observations. The permittee shall maintain records of the maintenance performed on each fabric filter and pressure gauges. These records shall include all maintenance work performed on each fabric filter including the frequency of bag/filter change outs. Records shall state the date and time of each fabric filter inspection, the inspection results, and corrective action taken, if any. Records shall be maintained on site as per Requirement 3.4.2. The differential pressure drop across each of the three fabric filters compartments (C-01, C-02 and C-03, Emission Points S-06, S-07 and S-08,) shall be monitored at least once daily. Records shall be kept on site with entries based on indicator gauge readings. The indicator gauges, mounted on each Fabric Filter Dust Collector compartment, shall be examined to ensure they are functioning properly. Minimum acceptable accuracy of pressure gauges is $\pm$ 2% of the full range. Readings should be averaged on a daily basis. A daily average pressure drop outside of the following range is considered an excursion:

Emission Point ID	Description	Control Device ID	CAM pressu (in of H_2
S-06	Briquet Dryer Discharge Conveyors	C-01	2-10.5
S-07	Briquet Packaging Lines	C-02	1-5.5
S-08	Finished Briquet Handling Lines	C-03	2-12

If an excursion occurs, corrective action, if necessary, shall be taken as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and recordkeeping and reporting shall be initiated.
[45CSR§§30-5.1.c and 12.7, and 40C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2)]

8.2.3. Visible emissions monitoring for Dry Storage tanks or their control devices (if any) with exhaust stacks located outdoors (Emission Points S-10 through S-17) shall be performed per Requirement 3.2.1. Upon beginning of normal operations weekly Method 22 checks shall be conducted at the time of each tank loading/unloading operations for a minimum of 6 consecutive weeks for all the emission points listed above. If in compliance, then monthly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.7, then corrective actions shall be taken immediately, and monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR13, R13-1608, 4.2.2 and 45CSR§30-5.1.c]

ATTACHMENT G - Air Pollution Control Device Form

Describe the parameters monitored and/or methods used to indicate performance of this control device. (Per Title V Operating Permit No. R30-0930004-2019MM02)

8.2.4. Visible emissions monitoring for Minors Ingredients Batching System and Briquet Handling emission points or their control devices (if any) with exhaust stacks located outdoors (Emission Points S-06, S-07, S-08, S-22 and S-23) shall be performed per Requirement 3.2.1. Upon beginning of normal operations weekly Method 22 checks shall be conducted for a minimum of 6 consecutive weeks for all the emission points listed above. If in compliance, then monthly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.1, then monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR13, R13-1608, 4.2.2 and 45CSR§30-5.1.c]

8.2.5. Each opacity evaluation observation per 45CSR§7A-2.1.a,b (as per Requirement 3.2.1) for Emission Points listed in Requirement 8.2.4. shall be a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) without averaging of results, unless any one single reading is greater than the opacity limit for the emission unit, in which case the observation period shall be extended to a 60 minutes or until a violation of the emissions standard per 45CSR§7-3.2 has been documented. (more than twenty (20) single opacity readings are in excess of 20% opacity, but less than 40% opacity, or any single reading is equal or in excess of 40% opacity); whichever is the shorter period.
[45CSR§30-5.1.c]

8.2.6. Compliance with the particulate matter and visible emission requirements as set forth in condition 8.1.4, (*Emission Unit EU-08-03H*) shall be determined by conducting daily Method 22-like visible emission checks. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40 C.F.R. Part 60, Appendix A, Method 22 or from the lecture portion of the 40 C.F.R. Part 60, Appendix A, Method 9 certification course.

The visible emission check shall be performed during periods of facility operation at least once per day during daylight hours and appropriate weather conditions for a sufficient time interval to determine if any visible emissions are present.

If visible emissions are present during these checks or at any other time, visible emissions evaluations in accordance with 45CSR§§7A-2.1.a and 2.1.b shall be conducted immediately. Such evaluations shall not be required if the visible emissions condition is corrected as expeditiously as possible and the cause and corrective measures taken are recorded. The 45CSR7A evaluations shall be conducted during periods of facility operation.
[45CSR§30-5.1.c, 45CSR§7A-2.1]

ATTACHMENT G – Air Pollution Control Device Form

Describe the parameters monitored and/or methods used to indicate performance of this control device. (Per Title V Operating Permit No. R30-0930004-2019MM02)

8.3. Testing Requirements

8.3.1. N/A

8.4. Recordkeeping Requirements

8.4.1. Keep records of the scrubber C-21 flow rate on daily basis when the scrubber is in operation, and also of date and time when flow rate drops below 3 gpm during normal operations, and of the inspection and corrective actions taken (if any) as per Requirement 8.2.1. **[45CSR§30-5.1.c]**

8.4.2. Visible emission checks recordkeeping as per Requirements 8.2.3 and 8.2.4.

8.4.3. General Recordkeeping Requirements for 40 C.F.R. Part 64 (CAM)

(1) The differential pressure per Requirement 8.2.2 shall be recorded daily.

(2) The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

(3) Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review and does not conflict with other applicable recordkeeping requirements.
[45CSR§30-5.1.c and 40 C.F.R. §64.9(b)]

8.5. Reporting Requirements

8.5.1. Opacity exceedance reporting as per Requirement 3.5.8.a.1.

8.5.2. General Reporting Requirements for 40 C.F.R. Part 64 (CAM)

(1) On and after the date specified in 40 C.F.R. §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. Part 64, the permittee shall submit monitoring reports to the Director in accordance with permit condition 3.5.6.

(2) A report for monitoring under 40 C.F.R. Part 64 shall include, at a minimum, the information required under permit condition 3.5.8 and the following information, as applicable:

(iv) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

ATTACHMENT G – Air Pollution Control Device Form

Describe the parameters monitored and/or methods used to indicate performance of this control device. (Per Title V Operating Permit No. R30-0930004-2019MM02)

(v) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(vi) A description of the actions taken to implement a QIP (if required by 3.2.6) during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 C.F.R. §64.9(a) and 45CSR§30-5.1.c]

8.6. Compliance Plan

8.6.1. N/A

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-02 Fabric Filter Dust Collector	**List all emission units associated with this control device.** E-08-02A Briquet Packaging Lines – Weigh Scales E-08-02B Briquet Packaging Lines - Bag Filling Operation	
Manufacturer: Standard Havens	**Model number:** 24A/M1	**Installation date:** 1992

Type of Air Pollution Control Device:

_X_ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	99+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
The briquet handling and packaging system is controlled by four (4) fabric filters (C-01 @ 15,000 cfm, C-02 @ 30,000 cfm, C-03 @ 25,000 cfm and C-35 @ 8,500 cfm).

Is this device subject to the CAM requirements of 40 C.F.R. 64? _X_ Yes ___ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See the requirements for C-01

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-03 Fabric Filter Dust Collector	**List all emission units associated with this control device.** E-08-03A through G Finished Briquet Handling Line	
Manufacturer: BHA/DCE Vokes	**Model number:** Not determined	**Installation date:** 1995

Type of Air Pollution Control Device:

_X__ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	99+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
The briquet handling and packaging system is controlled by four (4) fabric filters (C-01 @ 15,000 cfm, C-02 @ 30,000 cfm, C-03 @ 25,000 cfm and C-35 @ 8,500 cfm).

Is this device subject to the CAM requirements of 40 C.F.R. 64? _X_ Yes ___ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-07 Fabric Filter Dust Collector	**List all emission units associated with this control device.** E-06-01 Coal Tank E-06-02 Beryl Char Tanks	
Manufacturer: Adaptive Engineering & Fabrication	**Model number:** BVC-36	**Installation date:** 1986, replaced 2003

Type of Air Pollution Control Device:

_X_ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	99+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
Char and coal is transferred to the char and coal silos via bucket elevators. Particulate matter emissions from the silos are controlled by a fabric filter dust collector (C-07).

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.** N/A. Inherent process equipment used to collect and transfer raw materials.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-08 Thermal After-Combustion Chamber (ACC)	**List all emission units associated with this control device.** E-03-01 Rotary Wood Dryer and Retort Furnace E-05-01 Solvent Treated Briquette Production E-07-01 Wood Dryer Burner and Furnace Burner	
Manufacturer: Kingsford Mfg. Co.	**Model number:** None	**Installation date:** 2003

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	_X_ Other (describe) Direct thermal oxidizer
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
CO	100%	99%
VOC	100%	99%
PM/PM10/PM2.5	100%	95%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
The purpose of the ACC is waste heat energy recovery and control of particulates, CO and VOC. Volatile gases from the retort furnace are ducted by the furnace cyclones (C-06) to the ACC where they are combusted. Some of the resulting combustion gases are routed to the wood dryer as a heat source with the remainder of the ACC exhaust gases venting through the ACC stack. A natural gas burner (50 MMBtu) is used during startups, short duration maintenance shutdowns, and periodically during operation to maintain ACC temperatures above 1,600°F.

Is this device subject to the CAM requirements of 40 C.F.R. 64? _X_ Yes ___ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.
See attached sheets.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

(Per Title V Operating Permit No. R30-09300004-2019MM02)

5.0 After Combustion Chamber Requirements

5.1. Limitations and Standards

5.1.1. Summary of emissions to the atmosphere from ACC stack (Emission point S-01-01) and Briquet Dryers' stack (Emission points S-01-03, S-01-04, S-01N-05, S-01N-06) shall not exceed the following:

Emission Point ID	Pollutant	Hourly Emissions (lbs/hr)	Annual Emissions (TPY)
S-01-01 S-01-03 S-01-04 S-01N-05 S-01N-06	NO_x	87.5	237.51
	CO	11.9	13.31
	VOC	2.65	6.65
	SO_2	23.8	64.6
	PM	62.6	175.78
	PM_{10}	46.5	129.07
	Methanol	-	3.7

[45CSR13, R13-1608, 4.1.6]

5.1.2. No person shall cause, or allow the emission of particles of unburned or partially burned refuse or ash from any incinerator which are large enough to be individually distinguished in the open air.
[45CSR§6-4.5]

5.1.3. Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.
[45CSR§6-4.6]

5.1.4. No person shall cause, suffer, allow or permit the emission into the open air from any source operation an in- stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations.
[45CSR§10-4.1]

5.1.5. The ACC shall be operated such that the average combustion chamber temperature does not drop more than
50°F below temperature specified in Condition 5.2.2 for periods of time which do not exceed three (3) hours during normal operations (not including periods of system startup, shutdown or maintenance).
[45CSR13, R13 1608, 4.1.12]

5.2. Monitoring Requirements

5.2.1. **CAM monitoring requirement**. The permittee shall install, calibrate, maintain, and continuously operate a monitoring device with recorder for the measurement of the ACC combustion chamber temperature (E-03-01). The monitoring device is to be certified by the manufacturer to be accurate within + one (1) percent in degrees Fahrenheit. Accuracy of each thermocouple will be verified by a second thermocouple in the ACC stack. The validation check shall be conducted monthly. The acceptance criterion is +/- 50 °F.
[45CSR13, R13-1608, 4.2.3, 45CSR§30-5.1.c and 40C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2)]

5.2.2. Compliance with the hourly emission limits set forth in Requirement 4.1.3 and 6.1.2 will be demonstrated if the ACC average combustion chamber temperature is maintained at or above a minimum of 1,600°F on a rolling 3-hour average during normal operations (not including periods of system startup, shutdown or maintenance). The permittee may establish a lower ACC combustion chamber temperature by conducting a performance test at the lower temperature while demonstrating compliance with the emission limitations of paragraphs 4.1.3 and 6.1.2.
[45CSR13, R13-1608, 4.1.11, 45CSR§30-12.7 and 40C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2)]

5.2.3. **CAM monitoring requirement**. An excursion shall be defined as: if during normal operation, the 1-hour average ACC temperature drops below 1,600°F . Excursions trigger an on-screen alarm, an inspection and evaluation, corrective action, recordkeeping and reporting requirements. The monitoring system shall continually sense the indicator, poll the indicator at least once per minute, compute 1-hour averages, and record 1-hour averages.
[45CSR§30-12.7 and 40C.F.R. §§64.3(a), 64.3(b) and 64.6(c)(2)]

5.2.4. **Visible emissions monitoring per Requirement 3.2.1.** Daily Method 22 checks shall be conducted for a minimum of 4 consecutive weeks for the ACC stack outlet (Emission Point S-01-01). If in compliance, then weekly Method 22 checks shall be conducted. Anytime when not in compliance with the opacity limit per 45CSR§7-3.1, then for this emission point monitoring shall revert back to the daily frequency requirement and begin the progressive monitoring cycle again. A record of each visible emission check required above shall be maintained in accordance with Condition 3.4.2. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emission requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR13, R13-1608, 4.2.2]

5.2.5. Each opacity evaluation observation per 45CSR§7A-2.1.a, b as per Requirement 3.2.1 shall be a minimum of six (6) minutes (24 single readings, one each fifteen (15) seconds) without averaging of results, unless any one single reading is greater than the opacity limit for the emission unit, in which case the observation period shall be extended to a 60 minutes or until a violation of the emissions standard per 45CSR§7-3.2 has been documented (more than twenty (20) single opacity readings are in excess of 20% opacity, but less than 40% opacity, or any single reading is equal or in excess of 40% opacity); whichever is the shorter period.
[45CSR§30-5.1.c]

5.3. Testing Requirements

5.3.1. Testing per Section 3.3. Requirements

5.4. Recordkeeping Requirements

5.4.1. Records of the combustion chamber temperature shall be maintained in accordance with Condition 3.4.2.
[45CSR13, R13-1608, 4.2.3]

5.4.2. To demonstrate compliance with Requirement 5.1.3 the permittee shall maintain a record of all odor complaints received. Such record shall contain an assessment of the validity of the complaints as well as any corrective actions taken.
[45CSR§30-5.1.c]

5.4.3. Visible emission checks recordkeeping as per requirement 5.2.4.

5.4.4. General Recordkeeping Requirements for 40 C.F.R. Part 64 (CAM)

(1) The combustion chamber temperature per Requirement 5.2.2 shall be recorded hourly.

a. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

b. Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review and does not conflict with other applicable recordkeeping requirements.**[45CSR§30-5.1.c and 40 C.F.R. §64.9(b)]**

5.5. Reporting Requirements

5.5.1. Opacity exceedance reporting as per requirement 3.5.8.a.1.

5.5.2. General Reporting Requirements for 40 C.F.R. Part 64 (CAM)

(1) On and after the date specified in 40 C.F.R. §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. Part 64, the permittee shall submit monitoring reports to the Director in accordance with permit condition 3.5.6.

(2) A report for monitoring under 40 C.F.R. Part 64 shall include, at a minimum, the information required under permit condition 3.5.8 and the following information, as applicable:

(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(iii) A description of the actions taken to implement a QIP (if required by 3.2.6) during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 C.F.R. §64.9(a) and 45CSR§30-5.1.c]

5.6. Compliance Plan

5.6.1. N/A

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-11 Fabric Filter Dust Collector	**List all emission units associated with this control device.** E-06-05 Retort Char Tanks and Transfer	
Manufacturer: Mac Process, Inc.	**Model number:** Model 96 RT 52, Style III	**Installation date:** 2019

Type of Air Pollution Control Device:

_X_ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	99+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
Char is transferred pneumatically from the retort char transfer bin to the retort char receiver tank. Control of particulate matter is provided by this fabric filter (C-11).

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.** N/A. Inherent process equipment used to collect and transfer raw materials.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-12 Fabric Filter Dust Collector	**List all emission units associated with this control device.** E-06-06 Bulk Lime Tank	
Manufacturer: Adaptive Engineering & Fabrication	**Model number:** BVC-36	**Installation date:** 2001

Type of Air Pollution Control Device:

_X_ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	99+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
Lime is pneumatically transferred to the bulk lime tank. This fabric filter (C-12) controls particulate matter emission from this operation.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X__ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.** N/A. Inherent process equipment used to collect and transfer raw materials.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-13 Fabric Filter Dust Collector	**List all emission units associated with this control device.** E-06-07 Bulk Nitrate Tank	
Manufacturer: Adaptive Engineering	**Model number:** BVS-36X	**Installation date:** 2001

Type of Air Pollution Control Device:

_X_ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	99+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
Nitrate is pneumatically conveyed to the bulk nitrate tank (currently out of service). This fabric filter (C-13) controls particulate matter emissions from this operation.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.** N/A. Inherent process equipment used to collect and transfer raw materials.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-14 Fabric Filter Dust Collector	**List all emission units associated with this control device.** E-06-08 Bulk Starch Tank	
Manufacturer: Adaptive Engineering & Fabrication	**Model number:** BVC-36	**Installation date:** 2002

Type of Air Pollution Control Device:

_X_ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100	99+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Starch is pneumatically conveyed to the bulk starch tank. This fabric filter (C-14) provides control of particulate matter for this operation.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.** N/A. Inherent process equipment used to collect and transfer raw materials.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-15 Fabric Filter Dust Collector	**List all emission units associated with this control device.** E-06-09 Lime Use Tank	
Manufacturer: Schenck Process	**Model number:** 39AVRC14, Style II	**Installation date:** 2023

Type of Air Pollution Control Device:

_X_ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	99+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

This control device (C-15) controls particulate matter emissions from the lime use tank.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.** N/A. Inherent process equipment used to collect and transfer raw materials.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-16 Fabric Filter Dust Collector	**List all emission units associated with this control device.** E-06-0A Wet Starch Use Tank	
Manufacturer: Griffin	**Model number:** JV-54-4X	**Installation date:** 1993

Type of Air Pollution Control Device:

_X_ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	99+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

This control device (C-16) controls particulate matter emissions from the wet starch use tank.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.** N/A. Inherent process equipment used to collect and transfer raw materials.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-18 Fabric Filter Dust Collector	**List all emission units associated with this control device.** E-06-0C Borax Use Tank	
Manufacturer: Griffin	**Model number:** JV-54-4X	**Installation date:** 1993

Type of Air Pollution Control Device:

_X_ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	99+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

This fabric filter (C-18) provides control of particulate matter for the Borax use tank.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.** N/A. Inherent process equipment used to collect and transfer raw materials.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-21 Wet Scrubber	**List all emission units associated with this control device.** E-06-0F Minor Batch Mixing (starch, nitrate, and borax mixing tanks)	
Manufacturer: Mikro-Pul	**Model number:** Type DS2-30	**Installation date:** 1976

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	_X_ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	90+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

This scrubber (C-21) provides control of particulate matter for the minors mixer and the starch, nitrate and borax mixing tanks.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.** Pre-control emissions from this unit are less than major source thresholds.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-34 Wet Scrubber	**List all emission units associated with this control device.** E-02-09 Beryl Char and Truck Dumping	
Manufacturer: MikroPul Mikrovane Scrubber	**Model number:** Size 66, Type LP	**Installation date:** 2003

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	_X_ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	90+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

This scrubber (C-21) provides control of particulate matter for the Beryl Char and Truck Dump (E-02-09). The scrubber has an inlet gas volume of 15,000 cfm, a pressure drop of 5" W.G> and a water flow rate of 45 gpm @ 25 psi.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.** Pre-control emissions from this unit are less than major source thresholds.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-35 Fabric Filter Dust Collector	**List all emission units associated with this control device.** E-08-03H Packaging Scale Bin In Feed	
Manufacturer: Wheelabrator	**Model number:** Model 55	**Installation date:** 2011

Type of Air Pollution Control Device:

_X__ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	99+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
The briquet handling and packaging system is controlled by four (4) fabric filters (C-01 @ 15,000 cfm, C-02 @ 30,000 cfm, C-03 @ 25,000 cfm and C-35 @ 8,500 cfm).

Is this device subject to the CAM requirements of 40 C.F.R. 64? __ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**
Pre-control emissions from this unit are less than major source thresholds.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C-38 Wet Scrubber	**List all emission units associated with this control device.** E-06-05 Retort Char Tanks and Transfer	
Manufacturer: Mikro-Pul	**Model number:** SVS, Size 9/18	**Installation date:** 2019

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	X Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	__ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	90+%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Char is mechanically conveyed from the wood charring and drying system to the retort char transfer bin. This scrubber (C-38) provides control of particulate matter from these transfer operations.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.** Pre-control emissions from this unit are less than major source thresholds.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

See requirements for C-01

ATTACHMENT H
COMPLIANCE ASSURANCE MONITORING (CAM) FORM

TABLE H-1
CAM APPLICABILITY
KINGSFORD MANUFACTURING COMPANY - PARSONS, WEST VIRGINIA

Emission Point ID	Equipment Descriptions	Emission Point ID	Equipment Description and ID	Year Installed/ Modified	Design Capacity or Allowable Limit	Pollutant Controlled	Pre-Control Emissions	CAM Applicability
E-03-01 E-05-01	Wood Drying and Charring System Solvent Treated Briquet Operation	S-01-01, 19A	After Combustion Chamber C-08 95% destruction efficiency for VOC	2003	370,000	VOC, CO, PM/PM10/PM2.5	> 100 tpy	Applicable. Addressed in prior Title V applications
E-03-01	Wood Drying and Charring System	S-01-01	Four (4) Dryer Cyclones C-05 Fisher Klosterman XQ120-33	2003	58,372 ACFM	PM/PM10/PM2.5	N/A	N/A. Inherent process equipment used to collect dry wood.
E-03-01	Wood Drying and Charring System	S-01-01	Four (4) Furnace Cyclones C-06 Fisher Klosterman XQ120-23	1984	58,372 ACFM	PM/PM10/PM2.5	N/A	N/A. Inherent process equipment used to collect char.
E-05-01	Solvent Treated Briquet Operation	19A, 19B	Solvent chiller Mfg: Carrier, Model: 30RAN045J-601DT	2002	Unknown	VOC	N/A	N/A. The solvent chiller is not a control device as it does not "destroy or remove" pollutants.
E-08-01	Briquet Handling	S-06	Fabric Filter Dust Collector (C-01) Mfg: Pneumafil, Model: 11.5-3168	1992	15,000 CFM	PM/PM10/PM2.5	> 100 tpy	Applicable. Addressed in prior Title V applications
E-08-02A, B	Briquet Handling	S-07	Fabric Filter Dust Collector (C-02) Mfg: Standard Havens, Model: 24A/M1	1992	30,000 CFM	PM/PM10/PM2.5	> 100 tpy	Applicable. Addressed in prior Title V applications
E-08-02 C,D,E,F,G	Briquet Handling	S-08	Fabric Filter Dust Collector (C-03), Mfg: BHA / DCE Volkes	1995	25,000 CFM	PM/PM10/PM2.5	> 100 tpy	Applicable. Addressed in prior Title V applications
E-06-01 E-06-02	Coal Tank Beryl Char Tank	S-10	Fabric Filter Dust Collector (C-07) Mfg: Adaptive Engr., Model BVC-36	2003	560 CFM	PM/PM10/PM2.5	Unknown	N/A. Inherent process equipment used to collect and transfer raw materials.
E-06-05	Retort Char Tanks and Transfer	S-13	Fabric Filter Dust Collector (C-11) Mfg Mac Process, Inc., Model 96RT521, Style III	2012/2019	1366 CFM	PM/PM10/PM2.5	Unknown	N/A. Inherent process equipment used to collect and transfer raw materials.
E-06-05	Retort Char Tanks and Transfer	S-38	Venturi Scrubber (C-38) Mfg Mikro Pul, SVS, Size 9/18	2019	1200 CFM	PM/PM10/PM2.5	< 100 tpy	Not applicable
E-06-06	Bulk Lime Tank	S-14	Fabric Filter Dust Collector (C-12) Mfg: Adaptive Engr., BVC-36X	2003	560 CFM	PM/PM10/PM2.5	Unknown	N/A. Inherent process equipment used to collect and transfer raw materials.
E-06-07	Bulk Nitrate Tank (out of service)	S-15	Fabric Filter Dust Collector (C-13) Mfg: Adaptive Engr., BVC-36X	2001	560 CFM	PM/PM10/PM2.5	Unknown	N/A. Inherent process equipment used to collect and transfer raw materials.
E-06-08	Bulk Starch Tank	S-16	Fabric Filter Dust Collector (C-14) Mfg: Adaptive Engr., BVC-36X	2003	560 CFM	PM/PM10/PM2.5	Unknown	N/A. Inherent process equipment used to collect and transfer raw materials.
E-06-09	Lime Use Tank	S-17	Fabric Filter Dust Collector (C-15) Mfg: Schenck Process, 39AVRC14, Style II	2003 /2016/2023	560 CFM	PM/PM10/PM2.5	Unknown	N/A. Inherent process equipment used to collect and transfer raw materials.
E-06-0A	Wet Starch Use Tank	S-18*	Fabric Filter Dust Collector (C-16) Griffin, Model JV-54-4X	1993	425 CFM	PM/PM10/PM2.5	Unknown	N/A. Inherent process equipment used to collect and transfer raw materials.
E-06-0C	Borax Use Tank	S-20*	Fabric Filter Dust Collector (C-18) Griffin, Model JV-54-4X	1993	Unknown	PM/PM10/PM2.5	Unknown	N/A. Inherent process equipment used to collect and transfer raw materials.
E-06-0F	Minors Batch Mixing	S-23	Wet Scrubber (C-21) Mikropul Type DS2-30	1976	99.5% PM	PM/PM10/PM2.5	< 100 tpy	Not applicable
E-07-01	ACC and Furnace Burners	S-07-01	Furnace and ACC Burners	Various		VOC, CO, PM/PM10/PM2.5	Included with E-03-01	Applicable. Addressed in prior Title V applications as part of E-03-01
E-0A-01	Unleaded Gasoline (emits 1.1 TPY VOC)	S-25	Conservation vent (C-25)	1988	~~10,000~~ 500 gal	VOC	N/A	N/A. The vents are not control devices as they do not "destroy or remove" pollutants.
E-0A-02	Diesel Oil	S-26	Conservation vent (C-26)	1988	10,000 gal	VOC	N/A	
E-0A-03	Kerosene	S-27	Conservation vent (C-27)	1988	500 Gal	VOC	N/A	
E-0A-04	Oil 15/40	S-28	Conservation vent (C-28)	1988	<55 gal	VOC	N/A	
E-0A-05	Oil 30	S-29	Conservation vent (C-29)	1988	<55 gal	VOC	N/A	
E-0A-06	Transmission Fluid	S-10	Conservation vent (C-30)	1988	<55 gal	VOC	N/A	
E-0A-07	Hydraulic Fluid	S-31	Conservation vent (C-31)	1988	<55 gal	VOC	N/A	
E-0A-08	Used Oil	S-32	Conservation vent (C-32)	1996	500 gal	VOC	N/A	
E-0B-02	Emergency Generator	S-36	Catalyst	2012	228 BHP	CO	<100 tpy	Not applicable
E-02-09	Beryl Char and Coal Truck Dumping	S-34	Wet Scrubber (C-34) Mfg: MikroPul Mikrovane, Size 66, Type LN	2003	15,000 CFM	PM/PM10/PM2.5	< 100 tpy	Not applicable
E-08-03H	Briquet Handling	S-35	Fabric Filter Dust Collector (C-35) Wheelabrator, Model 55	2011	8,500 CFM	PM/PM10/PM2.5	<100 tpy	Not applicable

APPENDIX B
FACILITY EMISSIONS

TABLE B-1
POTENTIAL FACILITY EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WV

Source	Potential Annual Emissions (tons/yr)										
	NO_x	CO	VOC	SO_2	PM	PM_{10}	$PM_{2.5}$	Methanol	Lead	Total HAPs	Non-Biogenic CO_2e
Wood & Char Piles (E-01)					15.00	7.05	1.05		5.25E-05	5.25E-05	
Raw Material Handling (E-02)					0.71	0.34	0.05		2.97E-06	2.97E-06	
Charring & Briquet Dryers (E-03)	237.50	13.31	6.65	64.60	175.78	129.07	66.97	3.70	1.36E-02	3.71E+00	5722.68
Briquet Coolers (E-04)					38.50	19.25	11.55		6.43E-04	6.43E-04	
Solvent Treated Briquet Production (E-05)			83.00								
Minor Ingredient Batching/Dry Storage (E-06)					3.34	3.34	3.34		1.43E-05	1.43E-05	
Natural Gas Burning (E-07)	10.00	8.40	0.55	0.06	0.76	0.76	0.76		5.00E-05	5.00E-05	51,247.11
Briquet Handling (E-08)					29.47	29.47	29.47		4.92E-04	4.92E-04	
Plant Roads (E-09)					5.81	1.16	0.29				
Liquid Storage (E-10)			1.10								
Emergency Equipment (E-11)	3.29	0.89	0.32	0.28	0.27	0.27	0.27			5.50E-03	
Total	**250.79**	**22.60**	**91.62**	**64.94**	**269.63**	**190.71**	**113.75**	**3.70**	**1.48E-02**	**3.72**	**56,969.79**

Source	Operating Schedule (hr/yr)	Units	Maximum Annual Production (dry ton/yr)	Maximum Hourly Production (dry ton/hr)
ACC	8,760	Wood (dry)	209,000	38.5
		Wood (wet)	418,000	
Briquet Dryers	8,760	Dry Briquets	154,000	24

Potential to emit assumptions
Natural gas throughput - 200 MMcf/yr
Solvent treaded briquet (STB) production - 20 tph, 64,000 tpy
Baghouses - outlet grain loading 0.01 gr/scf, 8.760 hours/yr
Wood pile throughput - 500,000 tpy

TABLE B-2
WOOD AND CHAR PILE EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WEST VIRGINIA

Emissions Unit Number	Emissions Point Number	Name of Emissions Unit	Annual Throughput[a] (Dry Tons)	PM Emissions Factor[b] (lb/Dry Ton)	Control Factor	Hourly PM Emissions Rate (lbs)	Hourly PM_{10} Emissions Rate (lbs)	Hourly $PM_{2.5}$ Emissions Rate (lbs)	Annual PM Emissions Rate (Tons)	Annual PM_{10} Emissions Rate (Tons)	Annual PM2.5 Emissions Rate (Tons)
01	01	Wood Pile	250,000	0.1		2.85	1.34	0.20	12.50	5.88	0.88
	02	Char and coal Pile	50,000	0.1		0.57	0.27	0.04	2.50	1.18	0.18
TOTALS						3.42	1.61	0.24	15.00	7.05	1.05

[a] Emission factor based on conservative adjustment of AP-42 factors. PM10 and PM2.5 fractions were calculated pursuant to AP-42 Section 13.2.4. See Table C-3 for details.

TABLE B-3
MATERIAL HANDLING EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WEST VIRGINIA

Emissions Unit Number	Emissions Point Number	Name of Emissions Unit	Annual TPY	PM Emissions Factor[a]	PM_{10} Emissions Factor	$PM_{2.5}$ Emissions Factor	Control Factor	Hourly PM Emissions Rate	Hourly PM_{10} Emissions Rate	Hourly PM_{10} Emissions Rate	Annual PM Emissions Rate	Annual PM_{10} Emissions Rate	Annual $PM_{2.5}$ Emissions Rate
			(Wet Tons)	(lb/Wet Ton)	(lb/Wet Ton)	(lb/Wet Ton)		(lbs)	(lbs)	(lbs)	(Tons)	(Tons)	(Tons)
02	01	Transfer Drag Pit to 48" Belt	418,000	9.19E-04	4.35E-04	6.59E-05	0	0.043873909	0.020751173	0.00314232	0.192	0.091	0.014
02	02	Primary Screening	418,000	9.19E-04	4.35E-04	6.59E-05	0	0.043873909	0.020751173	0.00314232	0.192	0.091	0.014
02	03	Secondary Screening	125,400	9.19E-04	4.35E-04	6.59E-05	0	0.013162173	0.006225352	0.000942696	0.058	0.027	0.004
02	04	600 Ft Belt to Dryer Feed Bin	418,000	9.19E-04	4.35E-04	6.59E-05	0	0.043873909	0.020751173	0.00314232	0.192	0.091	0.014
02	05	Wood with Metal Bypass Belt	418	9.19E-04	4.35E-04	6.59E-05	0	4.38739E-05	2.07512E-05	3.14232E-06	1.92E-04	9.09E-05	1.38E-05
02	06	Wood Dryer Bin Bypass Screw	418	9.19E-04	4.35E-04	6.59E-05	0	4.38739E-05	2.07512E-05	3.14232E-06	1.92E-04	9.09E-05	1.38E-05
02	07	Char Truck Transport	0	9.19E-04	4.35E-04	6.59E-05	0	0	0	0	0.000	0.000	0.000
02	09	Beryl Char and Coal Truck Dumping	111,600	9.19E-04	4.35E-04	6.59E-05	0	0.011713704	0.005540265	0.000838954	5.13E-02	2.43E-02	3.67E-03
02	0A	Bulk Coal Tank to Belt Transfer	61,600	9.19E-04	4.35E-04	6.59E-05	0	0.006465629	0.003058068	0.000463079	2.83E-02	1.34E-02	2.03E-03
02	0B	Rerun Char Tank Bypass Screw	154	9.19E-04	4.35E-04	6.59E-05	0	1.61641E-05	7.64517E-06	1.1577E-06	7.08E-05	3.35E-05	5.07E-06
02	0C	Material Handling, Char Hammer mill		0	0	0	0	0	0	0	0.00	0.00	0.00
02	0D	Existing Wood Sizing Hammermill New Wood Sizing Hammermill		0	0	0	0	0	0	0	0.00	0.00	0.00
02	0E	Limestone Handling	15,000	2.E-02	1.E-02	2.E-03	0	0.042460029	0.020082446	0.003041056	0.19	0.09	0.01
TOTALS								0.16	0.08	0.01	0.71	0.34	0.05

[a]For wood coal and char, PM and PM_{10} emission factors estimated per AP-42, Section 13.2.4
Emissions Factor = Particle Size Multiplier x 0.0032 x (Wind Speed/5)$^{1.3}$ / (Moisture Content/2)$^{1.4}$
per AP-42, Section 13.2.4.
Particle size multiplier = 0.74 for PM_{30}, 0.35 for PM_{10}.
Wind speed = 6.2 mph
Moisture content conservatively assumed to be similar to coal (4.8%)

For bulk limestone unloading (e-02-0E), emissions were estimated from US EPA AP-42 Chapter 13.2.4 "Aggregate Handling and Storage Piles" (11/06) using the equation E=k*0.0032*[(U/5)1.3/(M/2)1.4] where E is the emission factor in lb/ton, k is the particle size multiplier, U is the mean wind speed in mph, and M is the material moisture content in %. Wind speed used in the calculations is 6.2mph (average annual wind speed for Parson, WV), and Moisture content used was 1% (lower range of moisture content of delivered limestone per supplier).Particle size multipliers are 0.74 for PM, 0.35 for PM10, and 0.053 for PM2.5. Thre e drop points were

TABLE B-4
CHARRING/ACC AND BRIQUET DRYER EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WV

Emissions Unit Number	Emissions Point Number	Pollutant	Maximum Annual Char Production (tons/yr)	Emission Factor[a] (lb/ton char)	Maximum Annual Wood Throughput (tons/yr)	Emission Factor[a] (lb/ton dry wood	ACC Stack Emission Rate[b] (ton/yr)	Briquet Dryer Stack Emission Rate[c] (ton/yr)	Total Emission Rate (ton/yr)
03	01/02/03N	NO_x	38,000	12.5	209,000	2.27	201.88	35.63	237.50
		CO	38,000	N/D	209,000	N/D	1.00	12.31	13.31
		VOC	38,000	N/D	209,000	N/D	1.15	5.50	6.65
		SO_2	38,000	3.4	209,000	0.62	54.91	9.69	64.60
		PM	38,000	7.23	209,000	1.31	137.28	38.50	175.78
		PM_{10}	38,000	5.78	209,000	1.05	109.82	19.25	129.07
		$PM_{2.5}$	38,000	2.51	209,000	0.46	47.72	15.40	63.12
		Methanol	38,000	N/D	209,000	N/D	0.64	3.06	3.70

[a] Emission factors for wood dryer/retort furnace/ACC system based upon data from similar Kingsford operations, increased for statistical confidence. The ACC PM_{10} fraction is estimated to be 80% of PM, again based on similar Kingsford operations.
[b] Stack emission rates for gaseous pollutants are split 85% to the ACC and 15% to the briquet dryers based on the 15% flow going to the briquet dryers. ACC stack emission factors & rates for TSP and PM_{10} do not account for the 15% exhausted to the briquet dryers since these emissions are accounted for in the dryer TSP/PM_{10} calculations.
[c] Briquet dryer PM emissions come from Table C-5.
[d]Methanol emissions using U.S. EPA AP-42 Section 10.7 (September 1995) ratio of methanol to VOC emission factors times estimated VOC emissions from ACC and briquet dryers:
AP-42 Ratio of Methanol to VOC = [(150 lb methanol/ton) / (270 lb VOC/ton)] = 0.556 methanol/VOC

TABLE B-5
BRIQUET DRYER/COOLER EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WV

Emissions Unit Number	Emissions Point Number	Source	Maximum Annual Production (tons/yr)	PM Emission Factor[a] (lb/ton briquets)	PM Emission Rate (ton/yr)	PM_{10} Emission Factor[a] (lb/ton briquets)	PM_{10} Emission Rate (ton/yr)	$PM_{2.5}$ Emission Factor[a] (lb/ton briquets)	$PM_{2.5}$ Emission Rate (ton/yr)
03	02/03N	Briquet Dryers	154,000	0.5	38.50	0.25	19.25	0.2	15.40
04	01/02N	Briquet Coolers	154,000	0.5	38.50	0.25	19.25	0.15	11.55

[a] PM emission factors based upon emissions data from similar Kingsford operations, increased for statistical confidence. PM10 fraction is assumed to be 50% of PM also based upon similar Kingsford operations., and PM2.5 factors based on emissions measured at aimilar Kingsford operations.

TABLE B-6
SOLVENT TREATED BRIQUET PRODUCTION EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WV

Emissions Unit Number	Emissions Point Number	Pollutant	Maximum Annual STB Production (tons/yr)	Total Emission Rate[a] (ton/yr)
05	01	VOC	64,000	83.00

[a] Emissions unchanged from current operating permit.
Hourly VOC Emissions
Scenario A - 2.82 lbs/hr @ 20 tph STB - ACC operating
Scenario B - 36.6 lbs/hr @ 13 tph STB - ACC down

TABLE B-7
MINOR INGREDIENT BATCHING/DRY STORAGE EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WEST VIRGINIA

Emissions Unit Number	Emissions Point Number	Name of Emissions Unit	Normal CFM	PM Emission Factor[a] (Gr/CF)	PM_{10} Emission Factor (Gr/CF)	$PM_{2.5}$ Emission Factor (Gr/CF)	Control Factor	Hourly PM Emission Rate (lbs)	Hourly PM_{10} Emission Rate (lbs)	Hourly $PM_{2.5}$ Emission Rate (lbs)	Annual PM Emission Rate (TONS)	Annual PM_{10} Emission Rate (TONS)	Annual $PM_{2.5}$ Emission Rate (TONS)
06	01	COAL TANK		1.00E-02	1.00E-02	1.00E-02	0.00%	0.00	0.00	0.00	0.000	0.000	0.000
	02	BERYL CHAR TANKS		1.00E-02	1.00E-02	1.00E-02	0.00%	0.00	0.00	0.00	0.000	0.000	0.000
	03	RERUN CHAR TANK	5	1.00E-01	1.00E-01	1.00E-01	0.00%	0.00	0.00	0.00	0.019	0.019	0.019
	04	YARD CHAR TANK	90	1.00E-01	1.00E-01	1.00E-01	0.00%	0.08	0.08	0.08	0.338	0.338	0.338
	05	RETORT CHAR TANKS & TRANSFER	2,506	1.00E-02	1.00E-02	1.00E-02	0.00%	0.21	0.21	0.21	0.941	0.941	0.941
	06	BULK LIME TANK	525	1.00E-02	1.00E-02	1.00E-02	0.00%	0.05	0.05	0.05	0.197	0.197	0.197
	07	BULK NITRATE TANK	560	1.00E-02	1.00E-02	1.00E-02	0.00%	0.05	0.05	0.05	0.210	0.210	0.210
	08	BULK STARCH TANK	560	1.00E-02	1.00E-02	1.00E-02	0.00%	0.05	0.05	0.05	0.210	0.210	0.210
	09	LIME USE TANK	560	1.00E-02	1.00E-02	1.00E-02	0.00%	0.05	0.05	0.05	0.210	0.210	0.210
	0A	WET STARCH USE TANK	425	1.00E-02	1.00E-02	1.00E-02	0.00%	0.04	0.04	0.04	0.160	0.160	0.160
	0C	BORAX USE TANK	250	1.00E-02	1.00E-02	1.00E-02	0.00%	0.02	0.02	0.02	0.094	0.094	0.094
	0D	NITRATE USE TANK	0	1.00E-02	1.00E-02	1.00E-02	0.00%	0.00	0.00	0.00	0.000	0.000	0.000
	0E	MULLER VENT	50	1.00E-01	1.00E-01	1.00E-01	90.00%	0.00	0.00	0.00	0.019	0.019	0.019
	0F	MINORS BATCH MIXING	2500	1.00E-02	1.00E-02	1.00E-02	0.00%	0.21	0.21	0.21	0.939	0.939	0.939
TOTALS								0.76	0.76	0.76	3.34	3.34	3.34

[a]PM and PM_{10} emission factors based on Kingsford operating experience for similar sources.

TABLE B-8
NATURAL GAS COMBUSTION EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WV

Emissions Unit Number	Emissions Point Number	Pollutant	Maximum Annual Natural Gas Throughput[a] (10^6 ft^3/yr)	Emission Factors[b] (lb/10^6 ft^3)	Annual Hours of Operation[c] (hours/yr)	Emission Rate[d] (lb/hr)	Emission Rate[d] (ton/yr)
07	01	NOx	200	100	8,760	2.28	10.00
		CO	200	84.0	8,760	1.92	8.40
		VOC	200	5.5	8,760	0.13	0.55
		SO_2	200	0.6	8,760	0.01	0.06
		$PM/PM_{10}/PM_{2.5}$	200	7.6	8,760	0.17	0.76
		Lead	200	0.0005	8,760	0.00001	0.00005

[a] Based on approximately 6 times the actual annual usage of ~30 MMCF/yr.
[a]Emission factors based upon EPA AP-42 emission factors for natural gas-fired boilers (Section 1.4, 7/98). All PM assumed to be less than 1.0 micrometer.

TABLE B-9
BRIQUET HANDLING DUST COLLECTOR EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WV

Emissions Unit Number	Emissions Point Number	Source	Pollutant	Flowrate (dscfm)	Exit Grain Loading[a] (gr/dscf)	Hours of Operation[b] (hr/yr)	Emission Rate (lb/hr)	Emission Rate (ton/yr)
08	01	Manufacturing	$PM/PM_{10}/PM_{2.5}$	15,000	0.01	8,760	1.29	5.63
	02	Packaging Process Equipment	$PM/PM_{10}/PM_{2.5}$	30,000	0.01	8,760	2.57	11.26
	03	Packaging Outside Handling	$PM/PM_{10}/PM_{2.5}$	25,000	0.01	8,760	2.14	9.39
	35	Packaging Weigh Scales	$PM/PM_{10}/PM_{2.5}$	8,500	0.01	8,760	0.73	3.19
						Total	6.73	29.47

[a]Typical baghouse exit grain loading. All PM is assumed to be PM2.5
[b]Hours of operation assumed similar to briquet dryer operating schedule.

TABLE B-10
PLANT ROAD POTENTIAL EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WEST VIRGINIA

Emissions Unit Number	Emissions Point Number	Path	Throughput (tons)	Truck Payload (tons)	Round Trips (#)	Road Segments Used	Round Trip Distance (miles)	Annual VMT (miles)	Annual Operating Schedule (hours/yr)	Pollutant	Emission Factor (lbs/VMT)[a]	Emission Rate (lb/hr)	Emission Rate (tons/yr)
09	01	Hogfuel Delivery[b]	500,000 tons hogfuel	20	25,000	A	0.228	5,700	8,760	PM	0.664	0.432	1.892
									8,760	PM10	0.133	0.086	0.378
									8,760	PM2.5	0.033	0.021	0.093
		Coal Delivery[c]	12,160 tons coal	23	529	A,B,F	0.532	281	8,760	PM	0.664	0.021	0.093
									8,760	PM10	0.133	0.004	0.019
									8,760	PM2.5	0.033	0.001	0.005
		Lime Delivery[d]	1,900 tons lime	23	83	A,B,C,D,E	1.100	91	8,760	PM	0.664	0.007	0.030
									8,760	PM10	0.133	0.001	0.006
									8,760	PM2.5	0.033	0.000	0.001
		Starch Delivery[e]	3,230 tons starch	23	140	A,B,C,D,E	1.100	154	8,760	PM	0.664	0.012	0.051
									8,760	PM10	0.133	0.002	0.010
									8,760	PM2.5	0.033	0.001	0.003
		Nitrate Delivery[f]	190 tons nitrate	23	8	A,B,C,D,E	1.100	9	8,760	PM	0.664	0.001	0.003
									8,760	PM10	0.133	0.000	0.001
									8,760	PM2.5	0.033	0.000	0.000
		Borax Delivery[g]	95 tons borax	21.5	4	A,B,C,D,E	1.100	5	8,760	PM	0.664	0.000	0.002
									8,760	PM10	0.133	0.000	0.000
									8,760	PM2.5	0.033	0.000	0.000
		Beryl Char Delivery[h]	28,000 tons char	15	1,867	A,B,C,F	0.684	1,277	8,760	PM	0.664	0.097	0.424
									8,760	PM10	0.133	0.019	0.085
									8,760	PM2.5	0.033	0.005	0.021
		Solvent Delivery[i]	7,642 tons solvent	22	347	A,B,C,D,E	1.100	382	8,760	PM	0.664	0.029	0.127
									8,760	PM10	0.133	0.006	0.025
									8,760	PM2.5	0.033	0.001	0.006
		Bag Delivery[j]	27,720,000 bags	107,712 Bags/Truck	257	A,B,C,D,E	1.100	283	8,760	PM	0.664	0.021	0.094
									8,760	PM10	0.133	0.004	0.019
									8,760	PM2.5	0.033	0.001	0.005
		Pallet Wrap Delivery[k]	206,360 lbs. wrap	44,000 lbs/Truck	5	A,B,C,D,E	1.100	5	8,760	PM	0.664	0.000	0.002
									8,760	PM10	0.133	0.000	0.000
									8,760	PM2.5	0.033	0.000	0.000
		Shrink Film Delivery[l]	1,155,000 lbs. film	44,000 lbs/Truck	26	A,B,C,D,E	1.100	29	8,760	PM	0.664	0.002	0.010
									8,760	PM10	0.133	0.000	0.002
									8,760	PM2.5	0.033	0.000	0.000
		Pallet Delivery[m]	308,000 pallets	540 Pallets/Truck	570	A,B	0.418	238	8,760	PM	0.664	0.018	0.079
									8,760	PM10	0.133	0.004	0.016
									8,760	PM2.5	0.033	0.001	0.004
		Pallet Cap Delivery[n]	18 Trucks/Year	N/A	18	A,B,C,D,E	1.100	20	8,760	PM	0.664	0.002	0.007
									8,760	PM10	0.133	0.000	0.001
									8,760	PM2.5	0.033	0.000	0.000
		Pallet Liner Delivery[n]	12 Trucks/Year	N/A	12	A,B,C,D,E	1.100	13	8,760	PM	0.664	0.001	0.004
									8,760	PM10	0.133	0.000	0.001
									8,760	PM2.5	0.033	0.000	0.000
		Misc. Delivery[n]	2 Trucks/Year	N/A	2	A,B,C,D,E	1.100	2	8,760	PM	0.664	0.000	0.001
									8,760	PM10	0.133	0.000	0.000
									8,760	PM2.5	0.033	0.000	0.000
		Outbound Traffic	154,000 tons product	22	7,000	80% A,B,C,D 20% A,G	0.684 1.442	5,849	8,760	PM	0.664	0.443	1.941
									8,760	PM10	0.133	0.089	0.388
									8,760	PM2.5	0.033	0.022	0.095
		Routine Traffic	12 Miles/Day			A,B,C,D,E,F,G	0.721	3157.98	8,760	PM	0.664	0.239	1.048
									8,760	PM10	0.133	0.048	0.210
									8,760	PM2.5	0.033	0.012	0.051
		Retort Char Surge Traffic	12 Trucks/Year	15 tons	12	A,B,C,D,E	0.189	2	8,760	PM	0.664	0.00017	0.00075
									8,760	PM10	0.133	0.00003	0.00015
									8,760	PM2.5	0.033	0.00001	0.00004
		Total								PM		1.326	5.808
										PM10		0.265	1.162
										PM2.5		0.065	0.285

Road Segment	Length (Miles)
A	0.114
B	0.095
C	0.076
D	0.057
E	0.208
F	0.057
G	0.114

[a] Emission factor calculated according to AP-42 Chapter 13.2.1 (1/11), Paved Roads using the equation lb/VMT = $k(sL)^{0.91}$ x $(W)^{1.02}$]where k = particle size multiplier, sL = road surface silt loading in g/m2, and W = average vehicle weight in tons,.
For the Parsons Plant, the following data was used:
sL = 2 g/m2, based on worst case silt loading result of road dust sampling conducted a the KMC Parsons plant.
W = 30 tons (average tractor-trailer weight)
k = 0.011 for PM, 0.0022 for PM_{10}, and 0.00054 for $PM_{2.5}$
[b] Based on maximum dry tons hogfuel and assuming 50% moisture
[c] Maximum coal deliveries bassed on 32% of total maximum briquet production of 154,000 tons/yr.
[d] Maximum limedeliveries bassed on 5% of total maximum briquet production of 154,000 tons/yr.
[e] Maximum starch deliveries bassed on 8.5% of total maximum briquet production of 154,000 tons/yr.
[f] Maximum nitrate deliveries bassed on 0.5% of total maximum briquet production of 154,000 tons/yr.
[g] Maximum borax deliveries bassed on 0.25% of total maximum briquet production of 154,000 tons/yr.
[h] Maximum allowable char proction of KMC Beryl plant.
[i] Maximum solvent deliveries bassed on 11.94% of total maximum STB production of 64,000 tons/yr.
[j] Maximum potential bag deliveries based on 180 11.1 # bags per ton of maximum briquet production rate of 154,000 tons.
[k] Maximum potential wrap deliveries based on 2 pallets per ton of maximum briquet production rate of 154,000 tons and 0.67 lbs. wrap per pallet.
[l] Maximum potential film deliveries based on 30 bales per ton of maximum briquet production rate of 154,000 tons and 0.25 lbs. film per bale.
[m] 2 pallets per ton of maximum briquet production rate of 154,000 tons.
[n] Based on past actual deliveries scaled to maximum potential production rate.

TABLE B-11
DIESEL WATER PUMP EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WEST VIRGINIA

Lake Pumps

Rated Capacity (hp)	Number of Sources	Annual Operating Schedule for Each Pump (hr/yr)	Pollutant	Emission Factor[a] (lbs/hp-hr)	Each Pump		All Pumps	
					Hourly Emissions (lbs/hr)	Annual Emissions (tons/yr)	Hourly Emissions (lbs/hr)	Annual Emissions (tons/yr)
115	4	500	PM	2.20E-03	0.25	6.33E-02	1.01	2.53E-01
115	4	500	SO2	2.05E-03	0.24	5.89E-02	0.94	2.36E-01
115	4	500	NOx	1.52E-02	1.75	4.37E-01	7.00	1.75E+00
115	4	500	CO	6.68E-03	0.77	1.92E-01	3.07	7.68E-01
115	4	500	VOC	2.51E-03	0.29	7.23E-02	1.16	2.89E-01

[a]Operating schedule for each pump based upon 0.5 hour of operation per month.
[b]All emission factors for uncontrolled diesel industrial engines. NOx per EPA 1997 standards for non-road combustion ignition engines. All others per EPA AP-42 (EPA AP-42, Section 3.3).

Fire Pump

Rated Capacity (hp)	Annual Operating Schedule (hr/yr)	Pollutant	Emissions Factors[a]			Emissions	
			(lb/MMBtu)	(g/hp-hr)	(lbs/hp-hr)	(lbs/hr)	(tons/yr)
420	500	NOx	N/D	6.640	0.0146	6.15	1.54
420	500	CO	N/D	0.490	0.0011	0.45	0.11
420	500	VOC	N/D	0.100	0.0002	0.09	0.02
420	500	$TPM/PM_{10}/PM_{2.5}$[b]	N/D	0.060	0.0001	0.06	0.01
420	500	SO_2	N/D	N/D	4.05E-04	0.17	0.04
HAPS							
420	500	Benzene	2.85E-04	N/D	2.00E-06	8.38E-04	2.09E-04
420	500	1,3-Butadiene	3.91E-05	N/D	2.74E-07	1.15E-04	2.87E-05
420	500	Toluene	4.09E-04	N/D	2.86E-06	1.20E-03	3.01E-04
420	500	Xylenes	2.85E-04	N/D	2.00E-06	8.38E-04	2.09E-04
420	500	Acetaldehyde	7.67E-04	N/D	5.37E-06	2.25E-03	5.64E-04
420	500	Acrolein	9.25E-05	N/D	6.48E-07	2.72E-04	6.80E-05
420	500	Napthalene	8.48E-05	N/D	5.94E-07	2.49E-04	6.23E-05
420	500	Formaldehyde	1.18E-03	N/D	8.26E-06	3.47E-03	8.67E-04
Total HAPS						9.24E-03	2.31E-03

[a]NOx, CO, VOC and PM emissions factors per engine manufacturer (Seee attached data sheet). All others per EPA AP-42 (EPA AP-42, Section 3.3, 3.4) assuming a BSFC of 7,000 Btu/hp-hr and a sulfur content of 500 ppm (0.05%).
[b]assumes all particulate matter is less than 1 µm as per EPA AP-42 Section 3.3 Table 3.3-1.

Emissions Using Manufacturer Supplied Emission Factors

Rated Capacity (kW/hr)	Rated Capacity (bhp-hr)	Annual Operating Schedule (hr/yr)	Pollutant	Emissions Factors		NSPS Emission Standards[b] (g/hp-hr)	Emissions	
				(g/kW-hr)[a]	(g/bhp-hr)		(lbs/hr)	(tons/yr)
177.50	238	100	NO_x	0.166	0.124	2.0	0.06	0.0032
177.50	238	100	VOC	0.166	0.124	1.0	0.06	0.0032
177.50	238	100	CO	0.417	0.311	4.0	0.16	0.0082

Emissions Using AP-42 Emission Factors

Rated Capacity MMBtu/hr)	Annual Operating Schedule (hr/yr)	Pollutant	Emissions Factors	Emissions	
			(lbs/MMBtu)	(lbs/hr)	(tons/yr)
1.969	100	$TPM/PM_{10}/PM_{2.5}$[c]	0.0194	0.0382	0.0019
1.969	100	SO_2	5.88E-04	1.16E-03	5.79E-05
HAPs					
1.969	100	1,1,2,2- Tetrachloroethane	2.53E-05	4.98E-05	2.49E-06
1.969	100	1,1,2-Trichloroethane	1.53E-05	3.01E-05	1.51E-06
1.969	100	1.3-Butadiene	6.63E-04	1.31E-03	6.53E-05
1.969	100	1,3-Dichloropropene	1.27E-05	2.50E-05	1.25E-06
1.969	100	Acetaldehyde	2.79E-03	5.49E-03	2.75E-04
1.969	100	Acrolein	2.63E-03	5.18E-03	2.59E-04
1.969	100	Benzene	1.58E-03	3.11E-03	1.56E-04
1.969	100	Carbon Tetrachloride	1.77E-05	3.48E-05	1.74E-06
1.969	100	Chlorobenzene	1.29E-05	2.54E-05	1.27E-06
1.969	100	Chloroform	1.37E-05	2.70E-05	1.35E-06
1.969	100	Ethylbenzene	2.48E-05	4.88E-05	2.44E-06
1.969	100	Ethylene Dibromide	2.13E-05	4.19E-05	2.10E-06
1.969	100	Formaldehyde	2.05E-02	4.04E-02	2.02E-03
1.969	100	Methanol	3.06E-03	6.02E-03	3.01E-04
1.969	100	Methylene Chloride	4.12E-05	8.11E-05	4.06E-06
1.969	100	Napthalene	9.71E-05	1.91E-04	9.56E-06
1.969	100	PAHs	1.41E-04	2.78E-04	1.39E-05
1.969	100	Styrene	1.19E-05	2.34E-05	1.17E-06
1.969	100	Toluene	5.58E-04	1.10E-03	5.49E-05
1.969	100	Vinyl Chloride	7.18E-06	1.41E-05	7.07E-07
1.969	100	Xylene	1.95E-04	3.84E-04	1.92E-05
Total HAPs				**6.38E-02**	**3.19E-03**

[a] Manufacturer combined emission factor for combined THC + NO_x of 0.166 g/kW-hr used individually for both NO_x and VOC to demonstrate compliance with owner-operator emission standards in 40 CFR 60 Subpart JJJJ Table 1.
[b] From 40 CFR Subpart JJJJ Table 1, Emergency Engines greater than 130 hp.
[c] Based on maximum fuel consumption of 1930 c.f. an hour at 100% load.
[d]Emission factors from U.S, EPA AP-42 Chapter 3.2, (07/2000) Natural Gas-fired Rich-Burn 4-stroke Reciprocating Engines.
[e]Assumes all particulate matter is less than 1 µm as per EPA AP-42 Section 3.2 Table 3.2-3(07/2000).

TABLE B-12
FACILITY LEAD EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WEST VIRGINIA

Emissions Unit Number	Emission Unit	Emissions Point Number	Emission Point	Material Processed	Maximum Hourly PM Emissions (lb/hr)	Maximum Annual PM Emissions (tons/yr)	Emission Factor[a] (lb Pb/ton PM)	Pb Emission Rate (lb/hr)	Pb Emission Rate (ton/yr)
01	Wood & Char Piles	01	Wood Pile	Wood	2.85	12.50	4.0E-03	5.71E-06	2.50E-05
		02	Char and Coal Pile	Char	0.57	2.50	2.2E-02	6.28E-06	2.75E-05
02	Raw Material Handling	01-06	Wood Handling Operations	Wood	0.14	0.63	4.0E-03	2.90E-07	1.27E-06
		07,09,0B	Char Handling Operations	Char	0.01	0.05	2.2E-02	1.29E-07	5.65E-07
		0A	Coal Handling Operations	Coal	0.01	0.03	8.00E-02	2.59E-07	1.13E-06
03	Charring and Briquet Dryers	01	ACC/Retort	Wood	N/A	175.78	1.5E-01	N/A	1.29E-02
		02,03	Briquet Dryers	Briquets	N/A	38.50	3.34E-02	N/A	6.43E-04
04	Briquet Coolers	01/02	Briquet Coolers	Briquets	N/A	38.50	3.34E-02	N/A	6.43E-04
06	Minor Ingredient Batching	01	Coal Tank	Coal	0.00	0.00	8.00E-02	0.00E+00	0.00E+00
		02-05,0G	Char Tanks	Char	0.30	1.30	2.2E-02	3.26E-06	1.43E-05
07	Natural Gas Use	01	Natural Gas Use	Natural Gas	See Table C-8 "Natural Gas Combustion"			1.14E-05	5.00E-05
08	Briquet Handling	01-03/35	Briquet Handling	Briquets	6.73	29.47	3.34E-02	1.12E-04	4.92E-04

[a]Emission factors based on following material lead content assumptions:
Wood - 2 ppm, dry wood per University of Missouri study
Char - based on worst-case char yield assumption of 5.5 (2ppm * 5.5 = 11 ppm = 2.2E-2 lb/ton)
Char ash content assumed to be 15%, ACC PM = 2.2E-02/0.15 = 0.147 lb/hr
Coal based on 40 ppm lead content
Briquets = 16.7 ppm based on char and coal in formulation of product.

TABLE B-13
GREENHOUSE GAS EMISSIONS
KINGSFORD MANUFACTURING CO. - PARSONS, WEST VIRGINIA

Natural Gas Combustion Emissions

Gas Use			GHG Emissions			
Max Gas Usage[a] (mmBTU/hr)	Max Hours of Operation	Maximum Gas combusted (mmBTU)	GHG Gas	Part 98 Emission Factor (kg/mmBTU)	CO_2e Emissions (Metric Tons)	CO_2e Emissions (Short Tons)
100	8,760	876,000.00	CO_2	53.02	46,445.52	51,196.90
			CH_4[b]	0.001	18.40	20.28
			N_2O[c]	0.0001	27.16	29.93

Wood Combustion Emissions

Wood Combustion					GHG Emissions			
Dry Wood Processed (Short Tons)	Char Produced (Short Tons)	Wood Combusted (Dry Wood Processed minus Char Produced, Short Tons)	Heat Value (mmBTU/Short Ton)	mmBTU combusted	GHG Gas	Part 98 Emission Factor (kg/mmBTU)	CO_2e Emissions (Metric Tons)	CO_2e Emissions (Short Tons)
209,000.0	38,000.0	171,000.0	15.38	2,629,980.00	CO_2 (Biogenic)	93.8	246,692.12	271,928.73
					CH_4[b]	0.032	1,767.35	1,948.15
					N_2O[c]	0.0042	3,424.23	3,774.53

[a] Based on the the total of the two (2) 50 mmBTU rated capacity of ACC burners.

[b] CH_4 emissions multiplied by a Global Warming Potential of 21 to correct to CO_2e.

[c] N_2O emissions multiplied by a Global Warming Potential of 310 to correct to CO_2e.