Complete App 8/16/2024

Friday, August 16, 2024 4:08 PM

Andrews, Edward S <edward.s.andrews@wv.gov>

Complete Email for Permit Application 13-3614

1 message

Andrews, Edward S <edward.s.andrews@wv.gov> Fri, Aug 16, 2024 at 4:07 PM
To: Gregg Frazier <gregg.frazier@reoprocessing.com>, Lisa.Schweder@terracon.com, hailie.orr@reoprocessing.com, Beverly D Mckeone <beverly.d.mckeone@wv.gov>
Bcc: James Robertson <james.robertson@wv.gov>, Bronwyn S Harrison <bronwyn.s.harrison@wv.gov>

RE: Application Status: Complete
REO Processing, Inc. - Huntington Facility
Permit Application R13-3614
Plant ID No. 011-00234

Mr. Frazier:

Your application for a construction permit for an activated carbon repackaging and transfer facility was received by this Division on April 12, 2024, and assigned to the writer for review. Upon review of said application, it has been determined that the application is complete and, therefore, the statutory review period commenced on August 5, 2024.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact Ed Andrews at (304) 926-0499 ext. 41244 or reply to this email.

--
Edward Andrews, P.E.
Engineer
WVDEP/Division of Air Quality
304-926-0499 Ext 41244
601 57th Street, SE
Charleston, WV 20304

Tentative Date for Site Visit 7/3/2024

Monday, August 19, 2024 9:26 AM

Andrews, Edward S <edward.s.andrews@wv.gov>

RE: Tentative Date for Site Visits for the Huntington and Kenova Facilities

1 message

Gregg Frazier <gregg.frazier@reoprocessing.com> Wed, Jul 3, 2024 at 1:04 PM
To: Hailie Orr <hailie.orr@reoprocessing.com>, William Palmer <william.palmer@reoprocessing.com>, Edward Andrews <edward.s.andrews@wv.gov>, "Schweder, Lisa" <Lisa.Schweder@terracon.com>

Edward,

Both the 17th and 18th work for us. Please let me know which date works best.

Thank you for your time,

Gregg G. Frazier

President

REO Processing, Inc.

www.reoprocessing.com

304-464-5444 (o)

937-545-8521 (m)

From: Hailie Orr <hailie.orr@reoprocessing.com>
Sent: Monday, July 1, 2024 12:36 PM
To: Gregg Frazier <gregg.frazier@reoprocessing.com>; William Palmer <william.palmer@reoprocessing.com>
Subject: FW: Tentative Date for Site Visits for the Huntington and Kenova Facilities
Importance: High

From: Andrews, Edward S <edward.s.andrews@wv.gov>
Sent: Monday, July 1, 2024 11:33 AM
To: Lisa.Schweder@terracon.com
Cc: Gregg Frazier <gregg.frazier@reoprocessing.com>; Hailie Orr <hailie.orr@reoprocessing.com>
Subject: Tentative Date for Site Visits for the Huntington and Kenova Facilities

Lisa,

My plan is to visit the Huntington Facility on the morning of (e.g. around 9:30-11:30) and the Kenova Facility in the early afternoon.

We are looking at either Wednesday, July 17th or Thursday, July 18th.

Please let me know which date works best for you and the folks at REO. If neither date works for your schedule, please propose at least two tentative dates.

Also, I am open to other suggestions too.

Thanks,

Ed

--

Edward Andrews, P.E.

Engineer

WVDEP/Division of Air Quality

304-926-0499 Ext 41244

601 57th Street, SE

Charleston, WV 25304

Inc App 6/3/2024

Monday, August 19, 2024 9:32 AM

Andrews, Edward S <edward.s.andrews@wv.gov>

RE: Incomplete App Email for Permit App R13-3614/REO Processing Inc.-Huntington

1 message

Schweder, Lisa <Lisa.Schweder@terracon.com>
To: "Andrews, Edward S" <edward.s.andrews@wv.gov>
Cc: Gregg Frazier <gregg.frazier@reoprocessing.com>, "Barrow, Liz R" <Liz.Barrow@terracon.com>

Good afternoon Edward,

Terracon Consultants, Inc. (Terracon) assisted with the preparation of the air permit application for the REO Processing Inc. Huntington, WV facility. Upon our review, the air permit application (updated information and cover letter summarizing updates are attached). Please let us know if you have any questions.

Thank you,

Lisa Schweder, P.E. (OH)
Staff Environmental Engineer I Environmental Services

Terracon
800 Morrison Road I Columbus, Ohio 43230

M (614) 256-0363

Lisa.Schweder@terracon.com I Terracon.com

CELEBRATING OVER 30 YEARS IN COLUMBUS

From: Schweder, Lisa
Sent: Friday, April 12, 2024 12:01 PM
To: Andrews, Edward S <edward.s.andrews@wv.gov>
Cc: Gregg Frazier <gregg.frazier@reoprocessing.com>
Subject: RE: Incomplete App Email for Permit App R13-3614/REO Processing Inc.-Huntington

Good morning Edward,

Thank you for your assistance with our permit application so far. We have compiled a second revision of the application to reflect the approved dust control plan as well as additional emission identified when completing the dust control plan.

Quick question regarding publishing the public notice: should REO move ahead with publishing the notice now? Or would you like a chance to review the application/provide approval before p

Thanks,

Lisa Schweder, E.I.T.
Staff Environmental Engineer I Environmental Services

Terracon
800 Morrison Road I Columbus, Ohio 43230

M (614) 256-0363

Lisa.Schweder@terracon.com I Terracon.com

CELEBRATING OVER 30 YEARS IN COLUMBUS

From: Andrews, Edward S <edward.s.andrews@wv.gov>
Sent: Monday, April 8, 2024 12:00 PM
To: Schweder, Lisa <Lisa.Schweder@terracon.com>
Subject: Re: Incomplete App Email for Permit App R13-3614/REO Processing Inc.-Huntington

Lisa,

It needs to be included in the application.

Thanks

Ed

Edward Andrews, P.E.

Engineer

WVDEP/Division of Air Quality

304-926-0499 Ext 41244

601 57th Street, SE

Charleston, WV 25304

On Mon, Apr 8, 2024 at 11:53 AM Schweder, Lisa <Lisa.Schweder@terracon.com> wrote:

> Good morning Edward,
>
> Quick question. As Gregg was reviewing the REO rail/truck process he came across a mobile bag house unit used in the area (picture attached). Would you like this portable bag house inc states having different requirements regarding portable sources/emission points, and just wanted to confirm what was needed before I add the paperwork.
>
> Thank you!
>
> Lisa Schweder, E.I.T.
> Staff Environmental Engineer I Environmental Services
>
> Terracon
> 800 Morrison Road I Columbus, Ohio 43230
>
> M (614) 256-0363
>
> Lisa.Schweder@terracon.com I Terracon.com
>
> ***CELEBRATING OVER 30 YEARS IN COLUMBUS***

From: Schweder, Lisa
Sent: Thursday, April 4, 2024 3:36 PM
To: Andrews, Edward S <edward.s.andrews@wv.gov>
Cc: Gregg Frazier <gregg.frazier@reoprocessing.com>; Barrow, Liz R <Liz.Barrow@terracon.com>
Subject: RE: Incomplete App Email for Permit App R13-3614/REO Processing Inc.-Huntington

Good afternoon Edward,

Thank you for reaching out with the list below, we have begun working on it today. Please see my initial answers in red, after discussing with Gregg Frazier. Also, I had one question for clar

Thanks,

Lisa Schweder, E.I.T.
Staff Environmental Engineer I Environmental Services

Terracon

800 Morrison Road I Columbus, Ohio 43230

M (614) 256-0363

Lisa.Schweder@terracon.com I Terracon.com

CELEBRATING OVER 30 YEARS IN COLUMBUS

From: Andrews, Edward S <edward.s.andrews@wv.gov>
Sent: Thursday, April 4, 2024 9:11 AM
To: Gregg Frazier <gregg.frazier@reoprocessing.com>; hailie.orr@reoprocessing.com; Schweder, Lisa <Lisa.Schweder@terracon.com>
Cc: Beverly D Mckeone <beverly.d.mckeone@wv.gov>; James Robertson <james.robertson@wv.gov>
Subject: Incomplete App Email for Permit App R13-3614/REO Processing Inc.-Huntington

RE: Application Status: Incomplete

REO Processing Inc.

Permit Application No. R13-3614

Plant ID No. 011-00243

Mr. Frazier:

Your submitted application for a modification permit for a material transfer and package facility was received by this Division on March 29, 2024, and assigned application, it has been determined that the application as submitted is incomplete based on the following items:

1. The approved dust control plan as required under Consent Order CO-R13-2023-11 needs to be included in the application. In process – will be sent in one

2. A Corrected legal ad needs to be published. The legal ad needs to disclose the other forms of particulate matter (e.g, Particulate matter less than 10 mic come to the DAQ's attention that Mr. Daniel Isaacs is no longer part of REO Processing's team in West Virginia. The current responsible official of your c address, in this legal ad. The notice needs to indicate the correct type of permit that REO Processing is seeking, which is a construction permit. Please republish application. A copy of the affidavit of publication needs to be forwarded to the DAQ once received from your publisher.

Ad has been corrected to include PM10 and PM2.5 as well as the current responsible official (Gregg Frazier). Will be published asap and affidavit forwarded.

3. All release points, to include vents, need to be identified in Attachment J. Each vent/release point needs to be identified with an individual identification (

Updated- will be sent in one compiled updated application within the next 30 days.

4. Air Pollution Control Device Sheet needs to be assigned to a Control Device ID No. If the same identical control device has multiple different application forms needs to be complete and annotated for the different applications/locations.

The Air Pollution Control Device Sheet (and app J) for the exhaust fans has been updated now with a Control Device ID No. Regarding the second part of this point about identical control multi-page Air Pollution Control Device Sheet for each control device: 1C, 2C, and 3C (the exhaust fan vents) – 3 total forms in Appendix M. Since there is not an area within these spe devices have, are you wanting us to add description somewhere about the different applications/locations (and therefore, just update the current 3 forms)? Or are you wanting one form for multiple areas and therefore there would be 6 sets of forms for each of the applications (small bagging, bulk loading, bulk unloading, railcar, dump trucks, and exhaust fans)? I would like to

5. Please review the location of the emission sources with associated control devices for these control devices on the provided plot plan for any errors and the application.

Will do. Dust control plan and plot plan will be compared once dust control plan is approved to ensure consistency and Gregg is reviewing one more time to ensure accuracy. Any updates will be sent in

6. Please provide, in detail, how the dust collection ductwork is going to be switched/reconfigured between the emission units (e.g. bulk tanker unloading The DAQ can see how very minor changes would be necessary in operating a pneumatic system (negative pressure/vacuum) to unload tanker trucks & railcars pneumatic (blower) system would be required to load the railcar. It might be better illustrated to provide a detailed diagram of the pneumatic circuit(s) and the e

Gregg will send you information on this.

7. Is any of the activated carbon received by the facility classified as spent activated carbon?

No

8. Please uncheck modification and check construction on page 1 of 4 of the "Application For NSR Permit" Form.

Completed and updated application form will be in updated application sent within the next 30 days.

Please address the above deficiencies in a revised application within thirty (30) days of the dust control plan being approved by the DAQ (paragraph 8.vi. c review will not commence until the application has been deemed to be technically complete. Failure to respond to this request in a timely manner may result in the deni

Should you have any questions, please contact Ed Andrews at (304) 926-0499 ext. 41244 or reply to this email.

--

Edward Andrews, P.E.

Engineer

WVDEP/Division of Air Quality

304-926-0499 Ext 41244

601 57th Street, SE

Charleston, WV 25304

REO Signed Permit Modifications 6-3-24 - signed.pdf
1490K

REO Signed Permit M...

800 Morrison Rd
Gahanna, OH 43230-6643
P 614-863-3113
F 614-863-0475
Terracon.com

May 9, 2024

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

Attn: Mr. Edward Andrews, P.E.
P: 304-926-0499 Ext 41244
E: edward.s.andrews@wv.gov

Re: Air Permit Updates Summary Letter
REO Processing Inc.
20 26th Street,
Huntington, WV 25703
Terracon Project No. N4247080

Dear Mr. Andrews:

Terracon Consultants, Inc. (Terracon) assisted with the preparation of the air permit application for the above-referenced facility, as requested by REO Processing Inc. Upon our review, the air permit application for the above-referenced facility has been updated.

Updates include:

- On the Application form, starting on page 3 of the application package:
  - UTM Coordinates were updated to kilometers, instead of meters;
  - The facility I.D. was listed as 011-00241. The facility I.D. was corrected to 011-00243 on #11A;
  - #14B the "Date of anticipated Start-Up" reflects a permit date of 8/1/2024 now;
  - For #34, the Authority of Corporation box is now selected.
  - The Authority Forms box on Page 4 (page 7 of the pdf) as well as Application Fee box are now checked.
- Attachment R has been added, due to the changes above on the Application form.
- Attachment M, the Air Pollution Control Device (APCD) Sheet lists carbon black as the pollutant. This has been updated on all Attachment M forms to reflect that material processed at this Huntington location is Activated Carbon. A further note has been added to Attachment M forms that states "No Particle size analysis has been conducted for this product but 30% of activated carbon received is manufactured greater than 43 micron" and "No Particle size analysis has been conducted for this product but 70% of activated carbon received is manufactured greater than 100 micron"
- Based on the information in the previous point, that material processed on site consists of 70% Granular Activated Carbon and 30% Powder Activated Carbon, a note was added to Attachment N as well that states "Particulate Matter consists of 70% Granular Activated Carbon and 30% Powder Activated Carbon. Granular carbon is approximately 30 microns in diameter. Total PM calculations assumed to include PM10 and PM2.5"
- The APCD Sheet for 3C lists the control efficiency as 99.9%, which is not reflected in Attachment N. The APCD Sheet was updated to reflect the 99% control efficiency, which is consistent with Attachment N now.

- Regarding Attachment N transfer points, the following statement has been added as a note: "The transfer of material Transfer Points occur simultaneously as the Transfer Point of dust collection to a baghouse for each unit. Based on this, the transfer of materials and dust collection to the baghouses are assumed to be combined in the emissions calculations."
- We have included an additional page, using information provided by the manufacturer of the fan filters, to Attachment N that provides calculations for the Engineering Estimate basis of the General Fugitive emissions. General Fugitive Emissions are assumed to emit from the fan filters mentioned throughout the application (EU 8S), listed in Attachment K and Attachment L. Based on this information, controlled general fugitive emissions were updated from 1.1 lb/hr and 1.43 tpy to 1.75 lb/hr and 2.27 tpy. Attachment N has been updated to reflect this change, which increases the controlled PM emissions from 28.94 tpy to 29.78 tpy.
- Finally, the SDS for the product CPG LF 12X40 lists Cobalt on page 32 of the pdf, and Cobalt Compounds are listed Hazardous Air Pollutant (HAP). Cobalt was not included as a HAP because, per the manufacturer, "The cobalt should be bound in the carbon matrix and not pose an emission issue. The % Co is 0.00037. It is just a trace impurity and not intentionally added."

If there are any questions regarding this report or if we may be of further assistance, please do not hesitate to contact us.

Sincerely,
Terracon Consultants, Inc.

Lisa Schweder

Lisa Schweder, PE
Staff Environmental Engineer

Lizzette R. Barrow

Lizzette R. Barrow, PE
Department Manager

REO Processing Inc. Representative:

Gregg Frazier
President
REO Processing, Inc

Attachments: Updated Application Information

Explore with us

UPDATED APPLICATION INFORMATION

APPLICATION

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

APPLICATION FOR NSR PERMIT AND TITLE V PERMIT REVISION (OPTIONAL)

PLEASE CHECK ALL THAT APPLY TO **NSR (45CSR13)** (IF KNOWN):

☒ CONSTRUCTION ☐ MODIFICATION ☐ RELOCATION
☐ CLASS I ADMINISTRATIVE UPDATE ☐ TEMPORARY
☐ CLASS II ADMINISTRATIVE UPDATE ☐ AFTER-THE-FACT

PLEASE CHECK TYPE OF **45CSR30 (TITLE V)** REVISION (IF ANY):

☐ ADMINISTRATIVE AMENDMENT ☐ MINOR MODIFICATION
☐ SIGNIFICANT MODIFICATION

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS **ATTACHMENT S** TO THIS APPLICATION

***FOR TITLE V FACILITIES ONLY:** Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.*

Section I. General

1. Name of applicant (**as registered with the WV Secretary of State's Office**):
REO Processing Inc.

2. Federal Employer ID No. **(FEIN)**:
81-4277734

3. Name of facility (**if different from above**):

4. The applicant is the:
☐ OWNER ☐ OPERATOR ☒ BOTH

5A. Applicant's mailing address:
221 Industrial Park Rd Parkersburg WV, 26104

5B. Facility's present physical address:
20 20th St Huntington WV 25703

6. **West Virginia Business Registration.** Is the applicant a resident of the State of West Virginia? ☒ YES ☐ NO
- If **YES,** provide a copy of the **Certificate of Incorporation/Organization/Limited Partnership** (one page) including any name change amendments or other Business Registration Certificate as **Attachment A.**
- If **NO,** provide a copy of the **Certificate of Authority/Authority of L.L.C./Registration** (one page) including any name change amendments or other Business Certificate as **Attachment A.**

7. If applicant is a subsidiary corporation, please provide the name of parent corporation:

8. Does the applicant own, lease, have an option to buy or otherwise have control of the **proposed site?** ☒ YES ☐ NO
- If **YES,** please explain: Own
- If **NO,** you are not eligible for a permit for this source.

9. Type of plant or facility (stationary source) to be **constructed, modified, relocated, administratively updated** or **temporarily permitted** (e.g., coal preparation plant, primary crusher, etc.): Modification to permit 13-3614 to include Dust Control Plan, truck loading process changes (hood, messenger, and vibrator), and fan filters.

10. North American Industry Classification System (**NAICS**) code for the facility:
493110

11A. DAQ Plant ID No. (for existing facilities only):
011 – 00243

11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

12A.

- For **Modifications, Administrative Updates** or **Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction** or **Relocation permits**, please provide directions to the *proposed new site location* from the nearest state road. Include a **MAP** as **Attachment B**.

Located approximately 530 feet south of the Ohio River, on the east side of 26th Street and north of Guyan Avenue.

12.B. New site address (if applicable):	12C. Nearest city or town: Huntington	12D. County: Cabell
12.E. UTM Northing (KM): 4254.895	12F. UTM Easting (KM): 377.028	12G. UTM Zone: 17

13. Briefly describe the proposed change(s) at the facility:
To Permit the repackaging of Activated and Granular Carbon. Permit modification will include Dust Control Plan, truck loading process changes, and fan filters.

14A. Provide the date of anticipated installation or change: 07/01/2024 – If this is an **After-the-Fact** permit application, provide the date upon which the proposed change did happen: / /	14B. Date of anticipated Start-Up if a permit is granted: 08/ 01 /2024

14C. Provide a **Schedule** of the planned **Installation** of/**Change** to and **Start-Up** of each of the units proposed in this permit application as **Attachment C** (if more than one unit is involved).

15. Provide maximum projected **Operating Schedule** of activity/activities outlined in this application:
Hours Per Day 12 Days Per Week 6 Weeks Per Year 52

16. Is demolition or physical renovation at an existing facility involved? ☐ YES ☒ NO

17. **Risk Management Plans.** If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your **Risk Management Plan (RMP)** to U. S. EPA Region III.

18. **Regulatory Discussion.** List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (*If known*). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (*if known*). Provide this information as **Attachment D**.

Section II. Additional attachments and supporting documents.

19. Include a check payable to WVDEP – Division of Air Quality with the appropriate **application fee** (per 45CSR22 and 45CSR13).

20. Include a **Table of Contents** as the first page of your application package.

21. Provide a **Plot Plan,** e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as **Attachment E** (Refer to ***Plot Plan Guidance***).
– Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).

22. Provide a **Detailed Process Flow Diagram(s)** showing each proposed or modified emissions unit, emission point and control device as **Attachment F**.

23. Provide a **Process Description** as **Attachment G**.
– Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H.**

– For chemical processes, provide a MSDS for each compound emitted to the air.

25. Fill out the **Emission Units Table** and provide it as **Attachment I.**

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J.**

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K.**

28. Check all applicable **Emissions Unit Data Sheets** listed below:

☐ Bulk Liquid Transfer Operations	☒ Haul Road Emissions	☐ Quarry
☐ Chemical Processes	☐ Hot Mix Asphalt Plant	☐ Solid Materials Sizing, Handling and Storage Facilities
☐ Concrete Batch Plant	☐ Incinerator	
☐ Grey Iron and Steel Foundry	☐ Indirect Heat Exchanger	☐ Storage Tanks

☒ General Emission Unit, specify Bulk truck loading, bulk truck unloading, small bagging station, railcar loading/unloading, open dump truck loading, railcar to tanker truck loading, and tanker truck to railcar loading.

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L.**

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

☐ Absorption Systems	☒ Baghouse	☐ Flare
☐ Adsorption Systems	☐ Condenser	☐ Mechanical Collector
☐ Afterburner	☐ Electrostatic Precipitator	☐ Wet Collecting System

☒ Other Collectors, specify Fan Filters

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M.**

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O.**

➢ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and ***Example Legal Advertisement*** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **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 found in the ***General Instructions*** as **Attachment Q.**

Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

☒ Authority of Corporation or Other Business Entity	☐ Authority of Partnership
☐ Authority of Governmental Agency	☐ Authority of Limited Partnership

Submit completed and signed **Authority Form** as **Attachment R.**

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

Certification of Truth, Accuracy, and Completeness

I, the undersigned ☒ **Responsible Official** / ☐ **Authorized Representative,** hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry. I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

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.

SIGNATURE _____ (Please use blue ink) DATE: 6/27/2024 (Please use blue ink)

35B. Printed name of signee: Gregg Frazier		35C. Title: President
35D. E-mail: Gregg.frazier@reaprocessing.com	35E. Phone: 304-484-5444	35F. FAX:
36A. Printed name of contact person (if different from above):		36B. Title:
36C. E-mail:	36D. Phone:	36E. FAX:

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

- ☒ **Attachment A: Business Certificate**
- ☒ **Attachment B: Map(s)**
- ☐ **Attachment C: Installation and Start Up Schedule**
- ☐ **Attachment D: Regulatory Discussion**
- ☒ **Attachment E: Plot Plan**
- ☒ **Attachment F: Detailed Process Flow Diagram(s)**
- ☒ **Attachment G: Process Description**
- ☒ **Attachment H: Material Safety Data Sheets (MSDS)**
- ☒ **Attachment I: Emission Units Table**
- ☒ **Attachment J: Emission Points Data Summary Sheet**
- ☒ **Attachment K: Fugitive Emissions Data Summary Sheet**
- ☒ **Attachment L: Emissions Unit Data Sheet(s)**
- ☒ **Attachment M: Air Pollution Control Device Sheet(s)**
- ☒ **Attachment N: Supporting Emissions Calculations**
- ☐ **Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans**
- ☒ **Attachment P: Public Notice**
- ☐ **Attachment Q: Business Confidential Claims**
- ☒ **Attachment R: Authority Forms**
- ☐ **Attachment S: Title V Permit Revision Information**
- ☒ **Application Fee**

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:

- ☐ ***Forward 1 copy of the application to the Title V Permitting Group and:***
- ☐ ***For Title V Administrative Amendments:***
  - ☐ ***NSR permit writer should notify Title V permit writer of draft permit,***
- ☐ ***For Title V Minor Modifications:***
  - ☐ ***Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt.***
  - ☐ ***NSR permit writer should notify Title V permit writer of draft permit.***
- ☐ ***For Title V Significant Modifications processed in parallel with NSR Permit revision:***
  - ☐ ***NSR permit writer should notify a Title V permit writer of draft permit,***
  - ☐ ***Public notice should reference both 45CSR13 and Title V permits,***
  - ☐ ***EPA has 45 day review period of a draft permit.***

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

ATTACHMENT K

Attachment K

FUGITIVE EMISSIONS DATA SUMMARY SHEET

The FUGITIVE EMISSIONS SUMMARY SHEET provides a summation of fugitive emissions. Fugitive emissions are those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening. Note that uncaptured process emissions are not typically considered to be fugitive, and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET.

Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions).

APPLICATION FORMS CHECKLIST - FUGITIVE EMISSIONS
1.) Will there be haul road activities? ☒ Yes ☐ No ☒ If YES, then complete the HAUL ROAD EMISSIONS UNIT DATA SHEET.
2.) Will there be Storage Piles? ☐ Yes ☒ No ☐ If YES, complete Table 1 of the NONMETALLIC MINERALS PROCESSING EMISSIONS UNIT DATA SHEET.
3.) Will there be Liquid Loading/Unloading Operations? ☐ Yes ☒ No ☐ If YES, complete the BULK LIQUID TRANSFER OPERATIONS EMISSIONS UNIT DATA SHEET.
4.) Will there be emissions of air pollutants from Wastewater Treatment Evaporation? ☐ Yes ☒ No ☐ If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.
5.) Will there be Equipment Leaks (e.g. leaks from pumps, compressors, in-line process valves, pressure relief devices, open-ended valves, sampling connections, flanges, agitators, cooling towers, etc.)? ☐ Yes ☒ No ☐ If YES, complete the LEAK SOURCE DATA SHEET section of the CHEMICAL PROCESSES EMISSIONS UNIT DATA SHEET.
6.) Will there be General Clean-up VOC Operations? ☐ Yes ☒ No ☐ If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.
7.) Will there be any other activities that generate fugitive emissions? ☒ Yes ☐ No ☒ If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET or the most appropriate form.
If you answered "NO" to all of the items above, it is not necessary to complete the following table, "Fugitive Emissions Summary."

FUGITIVE EMISSIONS SUMMARY	All Regulated Pollutants- Chemical Name/CAS [1]	Maximum Potential Uncontrolled Emissions [2]		Maximum Potential Controlled Emissions [3]		Est. Method Used [4]
		lb/hr	ton/yr	lb/hr	ton/yr	
Haul Road/Road Dust Emissions Paved Haul Roads						
Unpaved Haul Roads	70% Granular Activated Carbon and 30% Powder Activated Carbon CAS 7440-44-0	0.265	1.160	0.265	1.160	EE
Storage Pile Emissions						
Loading/Unloading Operations						
Wastewater Treatment Evaporation & Operations						
Equipment Leaks						
General Clean-up VOC Emissions						
Other	70% Granular Activated Carbon and 30% Powder Activated Carbon CAS 7440-44-0	2.5	3.25	1.75	2.27	EE

[1] List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS_2, VOCs, H_2S, Inorganics, Lead, Organics, O_3, NO, NO_2, SO_2, SO_3, all applicable Greenhouse Gases (including CO_2 and methane), etc. DO NOT LIST H_2, H_2O, N_2, O_2, and Noble Gases.

[2] Give rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

[3] Give rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

[4] Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).

ATTACHMENT L

Attachment L
EMISSIONS UNIT DATA SHEET
GENERAL

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on *Equipment List Form*): Other fugitive emissions

1. Name or type and model of proposed affected source:

   Other fugitive emissions from carbon loading and unloading.

2. On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.

3. Name(s) and maximum amount of proposed process material(s) charged per hour:

   1,748 PPH

4. Name(s) and maximum amount of proposed material(s) produced per hour:

   N/A

5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:

   N/A

* The identification number which appears here must correspond to the air pollution control device identification number appearing on the *List Form*.

6. Combustion Data (if applicable):

(a) Type and amount in appropriate units of fuel(s) to be burned:

N/A

(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:

(c) Theoretical combustion air requirement (ACF/unit of fuel):

@ °F and psia.

(d) Percent excess air:

(e) Type and BTU/hr of burners and all other firing equipment planned to be used:

(f) If coal is proposed as a source of fuel, identify supplier and seams and give sizing of the coal as it will be fired:

(g) Proposed maximum design heat input: × 10^3 BTU/hr.

7. Projected operating schedule:

Hours/Day	10	Days/Week	5	Weeks/Year	52

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:

@ °F and psia

a.	NO_x		lb/hr	grains/ACF
b.	SO_2		lb/hr	grains/ACF
c.	CO		lb/hr	grains/ACF
d.	PM_{10}		lb/hr	grains/ACF
e.	Hydrocarbons		lb/hr	grains/ACF
f.	VOCs		lb/hr	grains/ACF
g.	Pb		lb/hr	grains/ACF
h.	Specify other(s)			
	PM	2.5	lb/hr	grains/ACF
			lb/hr	grains/ACF
			lb/hr	grains/ACF
			lb/hr	grains/ACF

NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.

(2) Complete the Emission Points Data Sheet.

9. Proposed Monitoring, Recordkeeping, Reporting, and Testing
Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING	RECORDKEEPING
REPORTING	TESTING

MONITORING. PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

RECORDKEEPING. PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

REPORTING. PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

TESTING. PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

ATTACHMENT M

Attachment M
Air Pollution Control Device Sheet
(BAGHOUSE)

Control Device ID No. (must match Emission Units Table): 1C

Equipment Information and Filter Characteristics

1. Manufacturer: CamCorp
   Model No. CA9-1.5D
2. Total number of compartments: 1
3. Number of compartment online for normal operation: 1
4. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.
5. Baghouse Configuration: (check one)
   - ☐ Open Pressure
   - ☒ Closed Pressure
   - ☐ Closed Suction
   - ☐ Electrostatically Enhanced Fabric
   - ☐ Other, Specify
6. Filter Fabric Bag Material:
   - ☐ Nomex nylon
   - ☐ Polyester
   - ☐ Acrylics
   - ☐ Fiber Glass
   - ☐ Cotton Weight: oz./sq.yd
   - ☐ Teflon Thickness: in
   - ☐ Others, specify
   - ☐ Wool
   - ☒ Polypropylene
   - ☐ Ceramics
7. Bag Dimension:
   Diameter 15 in.
   Length 52 in.
8. Total cloth area: 2929 ft²
9. Number of bags: 9
10. Operating air to cloth ratio: 2.06 to 1 ft/min
11. Baghouse Operation: ☒ Continuous ☐ Automatic: ☐ Intermittent
12. Method used to clean bags:
    - ☒ Mechanical Shaker
    - ☐ Pneumatic Shaker
    - ☐ Bag Collapse
    - ☐ Manual Cleaning
    - ☐ Sonic Cleaning
    - ☐ Reverse Air Flow
    - ☒ Pulse Jet
    - ☐ Reverse Jet
    - ☐ Reverse Air Jet
    - ☐ Other:
13. Cleaning initiated by:
    - ☒ Timer
    - ☐ Expected pressure drop range: in. of water
    - ☐ Frequency if timer actuated
    - ☐ Other
14. Operation Hours: Max. per day: 10 Max. per yr: 2600
15. Collection efficiency: Rating: 100 % Guaranteed minimum: No guarantee provided

Gas Stream Characteristics

16. Gas flow rate into the collector: 6000 ACFM at Ambient °F and 90-100 PSIA
    ACFM: Design: PSIA Maximum: PSIA Average Expected: PSIA
17. Water Vapor Content of Effluent Stream: 1.4 lb. Water/lb. Dry Air
18. Gas Stream Temperature: Ambient °F
19. Fan Requirements: hp OR ft³/min
20. Stabilized static pressure loss across baghouse. Pressure Drop: High in. H_2O Low in. H_2O
21. Particulate Loading: Inlet: grain/scf Outlet: grain/scf

22. Type of Pollutant(s) to be collected (if particulate give specific type):
Activated Carbon

23. Is there any SO_3 in the emission stream? ☒ No ☐ Yes SO_3 content: ppmv

24. Emission rate of pollutant (specify) into and out of collector at maximum design operating conditions:

	IN		OUT	
Pollutant	lb/hr	grams/sec	lb/hr	grams/sec

25. Complete the table:	Particle Size Distribution at Inlet to Collector	Fraction Efficiency of Collector
Particulate Size Range (microns)	Weight % for Size Range	Weight % for Size Range
0 – 2		
2 – 4		
4 – 6		
6 – 8		
8 – 10		
10 – 12		
12 – 16		
16 – 20		
20 – 30		
30 – 40		
40 – 50	No Particle size analysis has been conducted for this product but 50% of activated carbon received is manufactured greater than 43 micron	
50 – 60		
60 – 70		
70 – 80		
80 – 90		
90 – 100		
>100	No Particle size analysis has been conducted for this product but 50% of activated carbon received is manufactured greater than 100 micron	

26. How is filter monitored for indications of deterioration (e.g., broken bags)?
- ☐ Continuous Opacity
- ☒ Pressure Drop
- ☐ Alarms-Audible to Process Operator
- ☐ Visual opacity readings, Frequency:
- ☐ Other, specify:

27. Describe any recording device and frequency of log entries:

Recordings have begun daily and turned in with the daily production logs

28. Describe any filter seeding being performed:

N/A

29. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification):

N/A

30. Describe the collection material disposal system:

Product is collected from the bottom valve of the baghouse in drums which are sealed and disposed of in an onsite roll off dumpster.

31. Have you included ***Baghouse Control Device*** in the Emissions Points Data Summary Sheet? Yes

32. **Proposed Monitoring, Recordkeeping, Reporting, and Testing**
Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING:	RECORDKEEPING:
Daily recordings of the pressure drop gauge	Recording are now turned with the daily production logs
REPORTING:	**TESTING:**
As requested	As requested

MONITORING: Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment or air control device.
RECORDKEEPING: Please describe the proposed recordkeeping that will accompany the monitoring.
REPORTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.
TESTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

33. Manufacturer's Guaranteed Capture Efficiency for each air pollutant.

No guarantee provided

34. Manufacturer's Guaranteed Control Efficiency for each air pollutant.

99%

35. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.

N/A

Attachment M
Air Pollution Control Device Sheet
(BAGHOUSE)

Control Device ID No. (must match Emission Units Table): 2C

Equipment Information and Filter Characteristics

1. Manufacturer: Donaldson
   Model No. 3DF6
2. Total number of compartments: 1
3. Number of compartment online for normal operation: 1
4. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.
5. Baghouse Configuration: (check one)
   - ☐ Open Pressure
   - ☒ Closed Pressure
   - ☐ Closed Suction
   - ☐ Electrostatically Enhanced Fabric
   - ☐ Other, Specify
6. Filter Fabric Bag Material:
   - ☐ Nomex nylon
   - ☐ Polyester
   - ☐ Acrylics
   - ☐ Fiber Glass
   - ☐ Cotton Weight: oz./sq.yd
   - ☐ Teflon Thickness: in
   - ☐ Wool
   - ☒ Polypropylene
   - ☐ Ceramics
   - ☐ Others, specify
7. Bag Dimension:
   Diameter 12.75 in.
   Length 2.17 ft.
8. Total cloth area: 10.86 ft²
9. Number of bags: 6
10. Operating air to cloth ratio: 46.65 / 70.95 ft/min
11. Baghouse Operation: ☒ Continuous ☐ Automatic ☐ Intermittent
12. Method used to clean bags:
    - ☐ Mechanical Shaker
    - ☐ Pneumatic Shaker
    - ☐ Bag Collapse
    - ☐ Manual Cleaning
    - ☐ Sonic Cleaning
    - ☐ Reverse Air Flow
    - ☒ Pulse Jet
    - ☐ Reverse Jet
    - ☐ Reverse Air Jet
    - ☐ Other:
13. Cleaning initiated by:
    - ☒ Timer
    - ☐ Expected pressure drop range: in. of water
    - ☐ Frequency if timer actuated
    - ☐ Other
14. Operation Hours: Max. per day: 10 Max. per yr: 2600
15. Collection efficiency: Rating: 100 % Guaranteed minimum: No Guarantee Provided

Gas Stream Characteristics

16. Gas flow rate into the collector: 2700 ACFM at: Ambient °F and PSIA
    ACFM: Design: PSIA Maximum: PSIA Average Expected: PSIA
17. Water Vapor Content of Effluent Stream: lb. Water/lb. Dry Air
18. Gas Stream Temperature: °F
19. Fan Requirements: hp OR ft³/min
20. Stabilized static pressure loss across baghouse. Pressure Drop: High in. H_2O Low in. H_2O
21. Particulate Loading: Inlet: grain/scf Outlet: grain/scf

22. Type of Pollutant(s) to be collected (if particulate give specific type):
Activated and Granular Carbon

23. Is there any SO_3 in the emission stream? ☒ No ☐ Yes SO_3 content: ppmv

24. Emission rate of pollutant (specify) into and out of collector at maximum design operating conditions:

	IN		OUT	
Pollutant	lb/hr	grams/sec	lb/hr	grams/sec

25. Complete the table:

	Particle Size Distribution at Inlet to Collector	Fraction Efficiency of Collector
Particulate Size Range (microns)	Weight % for Size Range	Weight % for Size Range
0 – 2		
2 – 4		
4 – 6		
6 – 8		
8 – 10		
10 – 12		
12 – 16		
16 – 20		
20 – 30		
30 – 40		
40 – 50	No Particle size analysis has been conducted for this product but 30% of activated carbon received is manufactured greater than 43 micron	
50 – 60		
60 – 70		
70 – 80		
80 – 90		
90 – 100		
>100	No Particle size analysis has been conducted for this product but 30% of activated carbon received is manufactured greater than 100 micron	

26. How is filter monitored for indications of deterioration (e.g., broken bags)?
- ☐ Continuous Opacity
- ☒ Pressure Drop
- ☐ Alarms-Audible to Process Operator
- ☐ Visual opacity readings, Frequency:
- ☐ Other, specify:

27. Describe any recording device and frequency of log entries:

Recordings have begun daily and turned in with the daily production logs

28. Describe any filter seeding being performed:

N/A

29. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification):

N/A

30. Describe the collection material disposal system:

Product is collected from the bottom valve of the baghouse in drums which are capped and sealed. These drums are disposed of in a roll off dumpster.

31. Have you included ***Baghouse Control Device*** in the Emissions Points Data Summary Sheet? Yes

32. **Proposed Monitoring, Recordkeeping, Reporting, and Testing**
Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING:	RECORDKEEPING:
Daily recordings of the pressure drop gauge	Recording are now turned with the daily production logs
REPORTING:	**TESTING:**
As requested	As requested

MONITORING: Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment or air control device.
RECORDKEEPING: Please describe the proposed recordkeeping that will accompany the monitoring.
REPORTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.
TESTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

33. Manufacturer's Guaranteed Capture Efficiency for each air pollutant.

No guarantee provided

34. Manufacturer's Guaranteed Control Efficiency for each air pollutant.

99%

35. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.

N/A

90 – 100		
>100		

27. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification):
N/A

28. Describe the collection material disposal system:
Particulate matter will collect on the exhaust fan filters. Fan filters will be inspected monthly and replaced if filters are soiled and restricting air flow.

29. Have you included ***Other Collectorss Control Device*** in the Emissions Points Data Summary Sheet?

30. **Proposed Monitoring, Recordkeeping, Reporting, and Testing**
Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING: Inspected monthly by maintenance.	RECORDKEEPING: As requested.
REPORTING: As requested.	TESTING: As requested.

MONITORING:	Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment or air control device.
RECORDKEEPING:	Please describe the proposed recordkeeping that will accompany the monitoring.
REPORTING:	Please describe any proposed emissions testing for this process equipment on air pollution control device.
TESTING:	Please describe any proposed emissions testing for this process equipment on air pollution control device.

31. Manufacturer's Guaranteed Control Efficiency for each air pollutant: N/A

32. Manufacturer's Guaranteed Control Efficiency for each air pollutant: N/A

33. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.
N/A

Attachment M
Air Pollution Control Device Sheet
(BAGHOUSE)

Control Device ID No. (must match Emission Units Table): 3C

Equipment Information and Filter Characteristics

1. Manufacturer: Rail Barge Truck Services, Inc.
   Model No. DC1400

2. Total number of compartments: 1

3. Number of compartment online for normal operation: 1

4. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.

5. Baghouse Configuration: (check one)
   - ☐ Open Pressure
   - ☒ Closed Pressure
   - ☐ Closed Suction
   - ☐ Electrostatically Enhanced Fabric
   - ☐ Other, Specify

6. Filter Fabric Bag Material:
   - ☐ Nomex nylon
   - ☒ Polyester
   - ☐ Acrylics
   - ☐ Fiber Glass
   - ☐ Cotton Weight: oz./sq.yd
   - ☐ Teflon Thickness: in
   - ☐ Others, specify
   - ☐ Wool
   - ☐ Polypropylene
   - ☐ Ceramics

7. Bag Dimension:
   Diameter 6 ¼ in.
   Length 39 in.

8. Total cloth area: 380 ft²

9. Number of bags: 11

10. Operating air to cloth ratio: ft/min

11. Baghouse Operation: ☐ Continuous ☐ Automatic: ☒ Intermittent

12. Method used to clean bags:
   - ☐ Mechanical Shaker
   - ☐ Pneumatic Shaker
   - ☐ Bag Collapse
   - ☐ Manual Cleaning
   - ☐ Sonic Cleaning
   - ☒ Reverse Air Flow
   - ☐ Pulse Jet
   - ☐ Reverse Jet
   - ☐ Reverse Air Jet
   - ☐ Other:

13. Cleaning initiated by:
   - ☒ Timer
   - ☐ Expected pressure drop range: in. of water
   - ☐ Frequency if timer actuated
   - ☐ Other

14. Operation Hours: Max. per day: 10
    Max. per yr: 2600

15. Collection efficiency: Rating: 99.9 %
    Guaranteed minimum: No Guarantee Provided

Gas Stream Characteristics

16. Gas flow rate into the collector: 1400 ACFM at: Ambient °F and PSIA
    ACFM: Design: PSIA Maximum: PSIA Average Expected: PSIA

17. Water Vapor Content of Effluent Stream: lb. Water/lb. Dry Air

18. Gas Stream Temperature: °F

19. Fan Requirements: hp
    OR
    ft³/min

20. Stabilized static pressure loss across baghouse. Pressure Drop: High in. H_2O
    Low in. H_2O

21. Particulate Loading: Inlet: grain/scf Outlet: grain/scf

22. Type of Pollutant(s) to be collected (if particulate give specific type):
Activated and Granular Carbon

23. Is there any SO_3 in the emission stream? ☒ No ☐ Yes SO_3 content: ppmv

24. Emission rate of pollutant (specify) into and out of collector at maximum design operating conditions:

	IN		OUT	
Pollutant	lb/hr	grams/sec	lb/hr	grams/sec

25. Complete the table:

	Particle Size Distribution at Inlet to Collector	Fraction Efficiency of Collector
Particulate Size Range (microns)	Weight % for Size Range	Weight % for Size Range
0 – 2		
2 – 4		
4 – 6		
6 – 8		
8 – 10		
10 – 12		
12 – 16		
16 – 20		
20 – 30		
30 – 40		
40 – 50	No Particle size analysis has been conducted for this product but 30% of activated carbon received is manufactured greater than 43 micron	
50 – 60		
60 – 70		
70 – 80		
80 – 90		
90 – 100		
>100	No Particle size analysis has been conducted for this product but 30% of activated carbon received is manufactured greater than 100 micron	

26. How is filter monitored for indications of deterioration (e.g., broken bags)?
- ☐ Continuous Opacity
- ☒ Pressure Drop
- ☐ Alarms-Audible to Process Operator
- ☐ Visual opacity readings, Frequency:
- ☐ Other, specify:

27. Describe any recording device and frequency of log entries:

Recordings have begun daily and turned in with the daily production logs.

28. Describe any filter seeding being performed:

N/A

29. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification):

N/A

30. Describe the collection material disposal system:

Product is collected from the bottom valve of the baghouse in drums which are capped and sealed. These drums are disposed of in a roll off dumpster.

31. Have you included ***Baghouse Control Device*** in the Emissions Points Data Summary Sheet? Yes

32. **Proposed Monitoring, Recordkeeping, Reporting, and Testing**
Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING:	RECORDKEEPING:
Daily recordings of the pressure drop gauge.	Recording are now turned with the daily production logs.
REPORTING:	**TESTING:**
As requested	As requested

MONITORING: Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment or air control device.

RECORDKEEPING: Please describe the proposed recordkeeping that will accompany the monitoring.

REPORTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

TESTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

33. Manufacturer's Guaranteed Capture Efficiency for each air pollutant.

No guarantee provided

34. Manufacturer's Guaranteed Control Efficiency for each air pollutant.

99%

35. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.

N/A

Attachment M
Air Pollution Control Device Sheet
(OTHER COLLECTORS)

Control Device ID No. (must match Emission Units Table): 4C (controls V1, V2, V3, V4, and V5)

Equipment Information

1. Manufacturer: Airflow Incorporated Model No. Airflow Pleat	2. Control Device Name: Exhaust Fan Filters Type: Pleated Panel Filters (five total, one for each exhaust fan)
3. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.	
4. On a separate sheet(s) supply all data and calculations used in selecting or designing this collection device.	
5. Provide a scale diagram of the control device showing internal construction.	
6. Submit a schematic and diagram with dimensions and flow rates.	
7. Guaranteed minimum collection efficiency for each pollutant collected: No guarantee.	
8. Attached efficiency curve and/or other efficiency information.	
9. Design inlet volume: N/A SCFM	10. Capacity:N/A
11. Indicate the liquid flow rate and describe equipment provided to measure pressure drop and flow rate, if any. N/A	
12. Attach any additional data including auxiliary equipment and operation details to thoroughly evaluate the control equipment.	
13. Description of method of handling the collected material(s) for reuse or disposal. If filters are soiled and restricting proper air flow, work orders will be entered for filter replacement.	

Gas Stream Characteristics

14. Are halogenated organics present?	☐ Yes	☒ No
Are particulates present?	☒ Yes	☐ No
Are metals present?	☐ Yes	☒ No

15. Inlet Emission stream parameters:	Maximum	Typical
Pressure (mmHg):		
Heat Content (BTU/scf):		
Oxygen Content (%):		
Moisture Content (%):		
Relative Humidity (%):		

16. Type of pollutant(s) controlled: ☐ SO_x ☐ Odor
☒ Particulate (type): Activated and granular carbon, PM fugitives ☐
Other

17. Inlet gas velocity: ft/sec	18. Pollutant specific gravity:
19. Gas flow into the collector: ACF @ °F and PSIA	20. Gas stream temperature: Inlet: °F Outlet: °F
21. Gas flow rate: Design Maximum: ACFM Average Expected: ACFM	22. Particulate Grain Loading in grains/scf: Inlet: Outlet:

23. Emission rate of each pollutant (specify) into and out of collector:

Pollutant	IN Pollutant lb/hr	IN Pollutant grains/act	Emission Capture Efficiency %	OUT Pollutant lb/hr	OUT Pollutant grains/act	Control Efficiency %
A Fugitive PM	2.5		unknown	1.1		unknown
B						
C						
D						
E						

24. Dimensions of stack: Height: ft. Diameter: ft.

25. Supply a curve showing proposed collection efficiency versus gas volume from 25 to 130 percent of design rating of collector.

Particulate Distribution

26. Complete the table: Particulate Size Range (microns)	Particle Size Distribution at Inlet to Collector: Weight % for Size Range	Fraction Efficiency of Collector: Weight % for Size Range
0 – 2		
2 – 4		
4 – 6		
6 – 8		
8 – 10		
10 – 12		
12 – 16		
16 – 20		
20 – 30		
30 – 40		
40 – 50	*No Particle size analysis has been conducted for this product but 30% of activated carbon received is pre-sieved and greater than 43 microns	
50 – 60		
60 – 70		
70 – 80		
80 – 90		

90 – 100		
>100	No Particle size analysis has been conducted for this product but 10% of activated carbon received is manufactured greater than 100 microns	

27. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification):
N/A

28. Describe the collection material disposal system:
Particulate matter will collect on the exhaust fan filters. Fan filters will be inspected monthly and replaced if filters are soiled and restricting air flow.

29. Have you included ***Other Collectorss Control Device*** in the Emissions Points Data Summary Sheet?

30. **Proposed Monitoring, Recordkeeping, Reporting, and Testing**
Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING: Inspected monthly by maintenance.	RECORDKEEPING: As requested.
REPORTING: As requested.	TESTING: As requested.

MONITORING:	Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment or air control device.
RECORDKEEPING:	Please describe the proposed recordkeeping that will accompany the monitoring.
REPORTING:	Please describe any proposed emissions testing for this process equipment on air pollution control device.
TESTING:	Please describe any proposed emissions testing for this process equipment on air pollution control device.

31. Manufacturer's Guaranteed Control Efficiency for each air pollutant: N/A

32. Manufacturer's Guaranteed Control Efficiency for each air pollutant: N/A

33. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.
These exhaust fan filters are located on the warehouse exhaust fans (two roof fans and three wall fans).

airflow products company

AirFLOW INCORPORATED

Features:

Available in economy, standard and high capacity versions

26 point high wet strength clay coated kraft board die cut frame

Radial pleat design

Media is 100% synthetic fibers - water and bacteria resistant

Media bonded to expanded metal support grid using water resistant adhesive

Media bonded to frame using water resistant adhesive

Also available MERV 8 - Series M8, MERV 11 - Series M11 and Series SS with self supporting media element

UL Class II rated as per UL 900 standard

AIRFLOW PLEAT—

Economy, Standard and High Capacity medium efficiency pleated panel filters

AIRFLOW PLEAT extended surface pleated panel filters are designed for use in air filtration systems and equipment, as stand alone basic efficiency products or as pre-filters to higher efficiency bag, rigid box or cell type filter.

The 26 point clay coated, kraft-board die cut frame, diagonal and horizontal support members, radial wedge design and expanded metal media support create one of the most rigid filters of its type in the industry.

The media pack, comprised of 100% polypropylene fibers, is bonded to the inside perimeter of the enclosure frame by a moisture resistant adhesive, providing a continuous and positive seal.

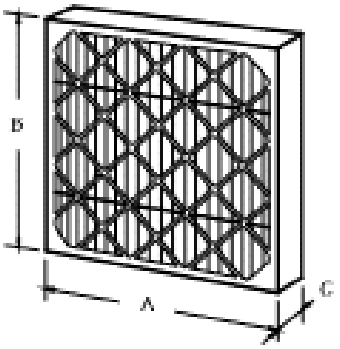
The standard offering is rated by Underwriters Laboratories as Class II, per UL Standard 900.

The AIRFLOW PLEAT is designed so as to work suitably within built up filter banks and/or side access systems. Available in nominal 1", 2" and 4" depths and 50 standard size offerings, this product is designed to fit most industrial and commercial applications with little or no system modification.

Rigid construction, extended surface and long service life are features and benefits which make the AIRFLOW PLEAT an excellent option for meeting the requirements today's filtration market.

AIRFLOW PLEAT

The Airflow Pleat is made from 100% synthetic media bonded with a water resistant adhesive to an expanded metal support grid and attached to a 26 point high wet strength clay-coated kraft board frame using water-resistant adhesive. The Airflow Pleat is available in standard sizes below in Economy - AFP1000, Standard - APF2000 and High - AFP3000 capacity in medium efficiency.

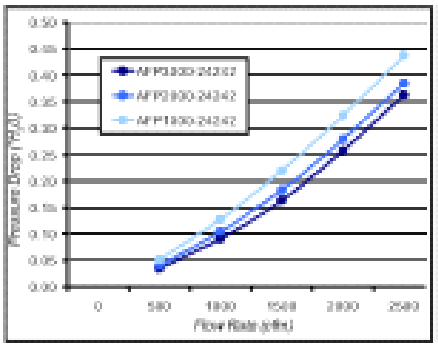


Size Chart - AFP1000, AFP2000, AFP3000

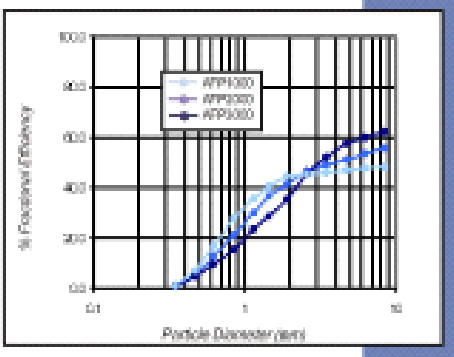
Model Number	Width "A"	Height "B"	Depth "C"
AFPx000-0901	24-1/2"	24-1/2"	3/4", 1-3/4", 3-3/4" *
AFPx000-4401	23-3/8"	23-3/8"	3/4", 1-3/4", 3-3/4" *
AFPx000-1601	19-1/2"	24-1/2"	3/4", 1-3/4", 3-3/4" *
AFPx000-0401	19-1/2"	23-3/8"	3/4", 1-3/4", 3-3/4" *
AFPx000-0801	19-1/2"	19-1/2"	3/4", 1-3/4", 3-3/4" *
AFPx000-1601	17-3/8"	24-1/2"	3/4", 1-3/4", 3-3/4" *
AFPx000-0801	17-3/8"	23-3/8"	3/4", 1-3/4", 3-3/4" *
AFPx000-1501	15-1/2"	24-1/2"	3/4", 1-3/4", 3-3/4" *
AFPx000-1001	15-1/2"	19-1/2"	3/4", 1-3/4", 3-3/4" *
AFPx000-2401	11-3/8"	23-3/8"	3/4", 1-3/4", 3-3/4" *
AFPx000-2001	11-3/8"	19-1/2"	3/4", 1-3/4", 3-3/4" *

* Economy Grade AFP1000 is available in 2" and 4" depths only.

Pressure Drop vs. Flow Rate



Efficiency vs. Particle Diameter



airflow products company
AirFLOW
INCORPORATED

100 Oak Tree Drive
Selma, North Carolina 27576
(919) 975-0240 Tel
(919) 975-0250 Fax

Distributed by:

National Air Filtration Association

ATTACHMENT N

Attachment N - Calculations, Controlled

See Notes section, below tables, for emission factor basis, transfer point assumptions, and fugitive engineering estimate explanations.

1S	Bulk Tanker Truck Unloading						
Transfer Point	Description	Transfer Rate TPH	TPY	Control Device	Control Device Efficiency	PM lb/hr	PM TPY
TP1	Hose to Hopper	10.7	27,820	Baghouse - 1C	99	5.99	7.79
TP2	Hopper to Super Sack	10.7	27,820	Baghouse - 1C	99	5.99	7.79
Total						5.992	7.790

1S design capacity limit on operation: 10.7 tons of material / hr and 27,820 tons of material / yr
Only one tanker truck transfer point shall be in operation at one time, therefore total emissions are based on one transfer point.

2S	Bulk Tanker Truck Loading						
Transfer Point	Description	Transfer Rate TPH	TPY	Control Device	Control Device Efficiency	PM lb/hr	PM TPY
TP1	Sack to Funnel	10.7	27,820	Hood and Baghouse - 1C	99	5.99	7.79
TP2	Funnel to Tanker	10.7	27,820	Hood and Baghouse - 1C	99	5.99	7.79
Total						5.992	7.790

2S design capacity limit on operation: 10.7 tons of material / hr and 27,820 tons of material / yr
Only one tanker truck transfer point shall be in operation at one time, therefore total emissions are based on one transfer point.

3S	Small Bagging (Bagging Machine 2)						
Transfer Point	Description	Transfer Rate TPH	TPY	Control Device	Control Device Efficiency	PM lb/hr	PM TPY
TP1	Sack to Tote	0.75	6570	Baghouse - 1C	99	0.42	1.980
TP2	Tote to Hopper	0.75	6570	Baghouse - 1C	99	0.42	1.980
TP3	Hopper to Bag	0.75	6570	Baghouse - 1C	99	0.42	1.980
Total						1.260	5.913

3S design capacity limit on operation: 0.75 tons of material / hr and 6,570 tons of material / yr

4S	Pneumatic Railcar Loading/Unloading						
Transfer Point	Description	Transfer Rate TPH	TPY	Control Device	Control Device Efficiency	PM lb/hr	PM TPY
TP1	Railcar to FIBC	10.7	1920	Baghouse - 1C	99	5.992	1.528
Total						5.992	1.528

4S design capacity limit on operation: 10.7 tons of material / hr and 1,920 tons of material / yr

5S	Open Dump Truck Loading						
Transfer Point	Description	Transfer Rate TPH	TPY	Control Device	Control Device Efficiency	PM lb/hr	PM TPY
TP1	FIBC to Dump Truck	40	13,000	Baghouse - 1C, and truck cover	99	22.4	3.640
Total						22.400	3.640

5S design capacity limit on operation: 40 tons of material/ hr and 13,000 tons/yr

6S	Railcar to Tanker Truck Loading						
Transfer Point	Description	Transfer Rate	TPY	Control Device	Control Device	PM lb/hr	PM TPY
TP1	Railcar to Tanker Truck	10.7	1920	Portable Baghouse - 1C	99	5.992	1.528
Total						5.992	1.528

6S design capacity limit on operation: 10.7 tons of material / hr and 1,920 tons of material / yr.

7S	Tanker Truck to Railcar Loading						
Transfer Point	Description	Transfer Rate	TPY	Control Device	Control Device	PM lb/hr	PM TPY
TP1	Tanker Truck to Railcar	10.7	1920	Portable Baghouse - 3C	99	5.992	0.569
Total						5.992	0.558

7S design capacity limit on operation: 10.7 tons of material / hr and 3,520 tons of material / yr

See Attachment K for General Fugitive Emissions and Haul Road Fugitive Emissions - using Engineering Estimate	PM TPY	3.432

29.78	PM TPY Total

NOTES:

Calculations use AP-42, Chapter 10.7, Table 10.7-1 Charcoal Briquetting 50 lb/ton (PM Emission Factor)

The transfer of material Transfer Points occur simultaneously as the Transfer Point of dust collection to a baghouse for each unit. Based on this, the transfer of materials and dust collection to the baghouses are assumed to be combined in the emissions calculations.

Particulate Matter consists of 70% Granular Activated Carbon and 30% Powder Activated Carbon. Granular carbon is approximately 30 microns in diameter. Total PM calculations assumed to include PM10 and PM2.5 Matter consists of activated carbon and granular carbon, approximately 30 microns in diameter. Total PM calculations assumed to include PM10 and PM2.5.

The Engineering Estimate calculations for Haul Roads emissions are found in the Attachment L Haul Roads form.

The Engineering Estimate for General Fugitive Emissions were derived from the filter manufacturing information, included after Attachment K.

See Emission Point Summary, below, for information on which emission units exit through which emission points.

Emission Point Summary

Emissions Point	Emissions Units through Emission Point	Maximum controlled PM lb/hr	Maximum controlled PM ton/yr	Control Device
1E	2S, 3S, 5S	20.65	16.95	1C, 4C
2E	1S, 4S	11.88	8.10	2C
3E	6S, 7S	11.88	1.00	3C
Fugitives		1.1	3.43	4C

Attachment N - Calculations, Uncontrolled

See Notes section, below tables, for emission factor basis, transfer point assumptions, and fugitive engineering estimate explanations.

1S	Bulk Tanker Truck Unloading				
Transfer Point	Description	Transfer Rate TPH	TPY	PM lb/Hr	PM TPY
TP1	Hose to Hopper	10.7	27,820	599.20	778.960
TP2	Hopper to Super Sack	10.7	27,820	599.20	778.960
Total				599.20	778.960

1S design capacity limit on operation: 10.7 tons of material / hr and 27,820 tons of material / yr
Only one tanker truck transfer point shall be in operation at one time, therefore total emissions are based on one transfer point

2S	Bulk Tanker Truck Loading				
Transfer Point	Description	Transfer Rate TPH	TPY	PM lb/Hr	PM TPY
TP1	Sack to Funnel	10.7	27,820	599.20	778.960
TP2	Funnel to Tanker	10.7	27,820	599.20	778.960
Total				599.20	778.960

2S design capacity limit on operation: 10.7 tons of material / hr and 27,820 tons of material / yr
Only one tanker truck transfer point shall be in operation at one time, therefore total emissions are based on one transfer point

3S	Small Bagging (Bagging Machine 3)				
Transfer Point	Description	Transfer Rate TPH	TPY	PM lb/Hr	PM TPY
TP1	Sack to Tote	0.75	6570	42	184.560
TP2	Tote to Hopper	0.75	6570	42	184.560
TP3	Hopper to Bag	0.75	6570	42	184.560
Total				126.00	553.680

3S design capacity limit on operation: 0.75 tons of material / hr and 6,570 tons of material / yr

4S	Pneumatic Railcar Loading/Unloading				
Transfer Point	Description	Transfer Rate TPH	TPY	PM lb/Hr	PM TPY
TP1	Railcar to FIBC	10.7	1920	599.2	51.360
Total				599.20	51.360

4S design capacity limit on operation: 10.7 tons of material / hr and 1,920 tons of material / yr

5S	Open Dump Truck Loading				
Transfer Point	Description	Transfer Rate TPH	TPY	PM lb/Hr	PM TPY
TP1	FIBC to Dump Truck	40	11,000	2240	164.000
Total				2240.00	164.00

5S design capacity limit on operation: 40 tons of material / hr and 11,000 tons/yr

6S	Railcar to Tanker Truck Loading				
Transfer Point	Description	Transfer Rate TPH	TPY	PM lb/Hr	PM TPY

TP1	Railcar to Tanker Truck	10.7	1920	399.2	51.350
Total				399.20	51.350

6S design capacity limit on operation: 10.7 tons of material / hr and 1,920 tons of material / yr

TS	Tanker Truck to Railcar Loading				
Transfer Point	Description	Transfer Rate TPH	TPY	PM Lb/Hr	PM TPY
TP1	Tanker Truck to Railcar	10.7	1920	399.2	51.350
Total				399.20	51.350

7S design capacity limit on operation: 10.7 tons of material / hr and 1,920 tons of material / yr

See Attachment K for General Fugitive Emissions and Haul Road Fugitive Emissions - using engineering estimate and no control	PM TPY:	4.450

2630.45 PM TPY Total

NOTES:

Calculations use AP-42, Chapter 10-7, Table 10.7-1 Charcoal Briquetting 56 lb/ton (PM Emission Factor)

The transfer of material Transfer Points occur simultaneously as the Transfer Point of dust collection to a baghouse for each unit. Based on this, the transfer of materials and dust collection to the baghouses are assumed to be contained in the emissions calculations.

Particulate Matter consists of 70% Granular Activated Carbon and 30% Powder Activated Carbon. Granular carbon is approximately 30 microns in diameter. Total PM calculations assumed to include PM10 and PM2.5

The Engineering Estimate calculations for Haul Roads emissions are found in the Attachment L Haul Roads form.

The Engineering Estimate for General Fugitive Emissions were derived from fan filter manufacturing information, included after Attachment K.

See Emission Point Summary, below, for information on which emission units emit through which emission points.

Emission Point Summary

Emissions Point	Emissions Units through Emission Point	Maximum Uncontrolled PM lb/hr	Maximum Uncontrolled PM ton/yr	Control Device
1E	2S, 3S, 5S	2965.20	1686.84	3C, 4C
2E	1S, 4S	1198.480	682.720	2C
3E	6S, 7S	1198.480	107.520	1C
Fugitives		2.5	3.25	4C

REO Processing, Inc.

Confidential

Title: Calculations for Huntington Filter Emissions

The activated carbon (granular and powder) particles are a rectangular and are screened prior to packaging at Calgon. Material processed at Huntington is 70% Granular and 30% Powder Activated Carbon. Furnished by Calgon, reflective of the mesh used in production

Particle Size of Activated Carbon	Mesh	Inches	mm
Granular	4	0.187	4.7498
	6	0.132	3.3528
Powder	80	0.007	0.1778
	325	0.0017	0.0432

Calculation

W	Particles emitted from warehouse floor		lbs/Hr
G	Amount of Granular		% granular of P
P	Amount of Powder		% powder of P
%FF	% Fractional Efficiency Filter		%
E	Emission Through Filters		lbs/Hr
			This is 50% due to the particle being rectangle
k	Percent length of given type		

Data

W	2.5	lbs/Hr
G	70%	Percent
P	30%	Percent

Particle Size

%FF	mm	4.7498	50%
%FF	mm	3.3528	50%
%FF	mm	0.1778	0%
%FF	mm	0.0432	0%

Calculation W*(k or P*%FF * k=E

Emissions

	Particle Size (mm)	PM Emission (lb/hr)
Granular	4.7498	0.5075
	3.3528	0.497
Total Granular PM (lb/hr)		0.9975

	Particle Size (mm)	PM Emission (lb/hr)
Powder	0.1778	0.375
	0.0432	0.375
Total Powder PM (lb/hr)		0.75

Total PM Emissions From Filter	1.748	lbs / hr	
	2.272	tons / yr	assuming 2600 hr/yr (10 hr/day, 5 days/week, 52 weeks/yr)
Total PM Emissions Without Filters	2.5	lbs / hr	
	3.25	tons / yr	assuming 2600 hr/yr (10 hr/day, 5 days/week, 52 weeks/yr)

ATTACHMENT R

Attachment R
AUTHORITY OF CORPORATION
OR OTHER BUSINESS ENTITY (DOMESTIC OR FOREIGN)

TO: The West Virginia Department of Environmental Protection, Division of Air Quality

DATE: June 3 , 2024

ATTN.: Director

Corporation's / other business entity's Federal Employer I.D. Number 81-4277734

The undersigned hereby files with the West Virginia Department of Environmental Protection, Division of Air Quality, a permit application and hereby certifies that the said name is a trade name which is used in the conduct of an incorporated business or other business entity.

Further, the corporation or the business entity certifies as follows:

(1) Gregg Frazier (is/are) the authorized representative(s) and in that capacity may represent the interest of the corporation or the business entity and may obligate and legally bind the corporation or the business entity.

(2) The corporation or the business entity is authorized to do business in the State of West Virginia.

(3) If the corporation or the business entity changes its authorized representative(s), the corporation or the business entity shall notify the Director of the West Virginia Department of Environmental Protection, Division of Air Quality, immediately upon such change.

President or Other Authorized Officer
(Vice President, Secretary, Treasurer or other official in charge of a principal business function of the corporation or the business entity)

(If not the President, then the corporation or the business entity must submit certified minutes or bylaws stating legal authority of other authorized officer to bind the corporation or the business entity).

Secretary

REO Processing Inc.
Name of Corporation or business entity

Revision 03/2007

Inc. Email 2nd App 4/4/2024

Thursday, April 4, 2024 9:12 AM

Andrews, Edward S <edward.s.andrews@wv.gov>

Incomplete App Email for Permit App R13-3614/REO Processing Inc.-Huntington

1 message

Andrews, Edward S <edward.s.andrews@wv.gov> Thu, Apr 4, 2024 at 9:11 AM
To: Gregg Frazier <gregg.frazier@reoprocessing.com>, hailie.orr@reoprocessing.com, Lisa.Schweder@terracon.com
Cc: Beverly D Mckeone <beverly.d.mckeone@wv.gov>, James Robertson <james.robertson@wv.gov>

RE: Application Status: Incomplete
REO Processing Inc.
Permit Application No. R13-3614
Plant ID No. 011-00243

Mr. Frazier:

Your submitted application for a modification permit for a material transfer and package facility was received by this Division on March 29, 2024, and assigned to the writer for review. Upon initial review of said application, it has been determined that the application as submitted is incomplete based on the following items:

1. The approved dust control plan as required under Consent Order CO-R13-2023-11 needs to be included in the application.

2. A Corrected legal ad needs to be published. The legal ad needs to disclose the other forms of particulate matter (e.g, Particulate matter less than 10 micros, Particulate matter less than 2.5 microns). It has come to the DAQ's attention that Mr. Daniel Isaacs is no longer part of REO Processing's team in West Virginia. The current responsible official of your organization needs to be identified, with the correct address, in this legal ad. The notice needs to indicate the correct type of permit that REO Processing is seeking, which is a construction permit. Please republish a corrected legal ad within 5 days of submitting the application. A copy of the affidavit of publication needs to be forwarded to the DAQ once received from your publisher.

3. All release points, to include vents, need to be identified in Attachment J. Each vent/release point needs to be identified with an individual identification (e.g., V1, V2, etc.).

4. Air Pollution Control Device Sheet needs to be assigned to a Control Device ID No. If the same identical control device has multiple different applications, then one set of Air Pollution Control Device Sheet forms needs to be complete and annotated for the different applications/locations.

5. Please review the location of the emission sources with associated control devices for these control devices on the provided plot plan for any errors and revise if necessary the plot and any other part(s) of the application.

6. Please provide, in detail, how the dust collection ductwork is going to be switched/reconfigured between the emission units (e.g. bulk tanker unloading to railcar unloading/loading) for control device 2C. The DAQ can see how very minor changes would be necessary in operating a pneumatic system (negative pressure/vacuum) to unload tanker trucks & railcars with the same system. However, a positive pressure pneumatic (blower) system would be required to load the railcar. It might be better illustrated to provide a detailed diagram of the pneumatic circuit(s) and the equipement.

7. Is any of the activated carbon received by the facility classified as spent activated carbon?

8. Please uncheck modification and check construction on page 1 of 4 of the "Application For NSR Permit" Form.

Please address the above deficiencies in a revised application within thirty (30) days of the dust control plan being approved by the DAQ (paragraph 8.vi. of Consent Order CO-R13-E-2023-11). Application review will not commence until the application has been deemed to be technically complete. Failure to respond to this request in a timely manner may result in the denial of the application.

Should you have any questions, please contact Ed Andrews at (304) 926-0499 ext. 41244 or reply to this email.

--
Edward Andrews, P.E.
Engineer
WVDEP/Division of Air Quality
304-926-0499 Ext 41244
601 57th Street, SE
Charleston, WV 25304

Affidavit (2nd App) 4/22/2024

Friday, August 16, 2024 8:39 AM

Andrews, Edward S <edward.s.andrews@wv.gov>

RE: [REO Processing Inc.; Huntington, WV]

1 message

Schweder, Lisa <Lisa.Schweder@terracon.com> Mon, Apr 22, 2024 at 11:42 AM
To: "DEPAirQualityPermitting@wv.gov" <DEPAirQualityPermitting@wv.gov>
Cc: Gregg Frazier <gregg.frazier@reoprocessing.com>, "Barrow, Liz R" <Liz.Barrow@terracon.com>, "Andrews, Edward S" <edward.s.andrews@wv.gov>

Good morning,

Please find the affidavit for the updated Air Permit Application in Huntington, WV for REO Processing Inc. attached.

Thanks,

Lisa Schweder, E.I.T.
Staff Environmental Engineer I Environmental Services

Terracon

800 Morrison Road I Columbus, Ohio 43230

M (614) 256-0363

Lisa.Schweder@terracon.com I Terracon.com

CELEBRATING OVER 30 YEARS IN COLUMBUS

From: Schweder, Lisa
Sent: Friday, April 12, 2024 12:44 PM
To: DEPAirQualityPermitting@wv.gov

Cc: Gregg Frazier <gregg.frazier@reoprocessing.com>; Barrow, Liz R <Liz.Barrow@terracon.com>; Andrews, Edward S <edward.s.andrews@wv.gov>
Subject: [REO Processing Inc.; Huntington, WV]

Good afternoon,

Please find the updated Air Permit Application in Huntington, WV for REO Processing Inc. attached.

Thank you,

Lisa Schweder, E.I.T.
Staff Environmental Engineer I Environmental Services

Terracon

800 Morrison Road I Columbus, Ohio 43230

M (614) 256-0363

Lisa.Schweder@terracon.com I Terracon.com

CELEBRATING OVER 30 YEARS IN COLUMBUS

affidavit.pdf
288K

affidavit

AFFIDAVIT OF PUBLICATION

I, ______________ being duly sworn, depose and say that I am Legal Clerk for *The Herald-Dispatch*, HD Media Co., LLC, who publishes at Huntington, Cabell County, West Virginia, the newspaper *The Herald-Dispatch*, an independent newspaper, the morning seven days each week, Monday through Sunday including New Year's Day, Memorial Day, the Fourth of July, Labor Day, Thanksgiving and Christmas; that I have been duly authorized by the Board of Directors of such corporation and the newspaper mentioned herein; that the legal advertisement attached to the left margin of this affidavit and made a part hereof and bearing number 172171, was duly published in the *The Herald-Dispatch* once a week for 1 successive weeks, commencing with the issue of 04/13/2024 and ending with the issue of 04/13/2024, that said legal advertisement was published on the following dates: 04/13/2024 that the cost of publishing said annexed advertisement as aforesaid was $46.32; that such newspaper in which such legal advertisement was published has been and is now published regularly, at least as frequently as once a week for at least fifty weeks during the calendar year as prescribed by its mailing permit and has been so published in the municipality of Huntington, Cabell County, West Virginia, for at least one year immediately preceding the date on which the legal advertisement set forth herein was delivered to such newspaper for publication, that such newspaper is a newspaper of "general circulation" as defined in article 3, chapter 59, of the West Virginia Code within the publication area or areas of the municipality of Huntington, Cabell, Putnam and Wayne Counties, West Virginia, and that such newspaper is circulated to the general public at a definite price or consideration; that such newspaper on each date published consists of not less than four pages without a cover, and that it is a newspaper to which the general public resorts for passing events of a political, religious, commercial and social nature, and for current happenings, announcements, miscellaneous reading matter, advertisements and other notices.

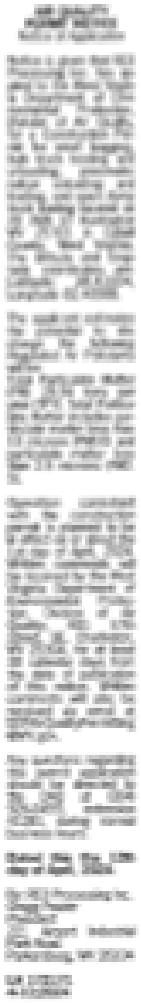
Taken, subscribed and sworn to before me in my said county this day: 04/13/2024

My commission expires ______________

____

Notary Public
Cabell County, West Virginia

____



Acct Id:	1629689	
Name:	R&D PROCESSING	
Phone:	304-464-0444	
Address:	221 INDUSTRIAL BLVD	
City:	PARKERSBURG	
State:	WV	
Postcode:	26104	
Class:	0010	Legal Notices
Edition:	HD	
Start:	04/13/2024	
Stop:	04/13/2024	
Issues:	1	
Units:	61.0	
Order ID:	HC 172171	
TFN:	C	
TFN cycle:		
Rep:	BRREMFROE	
Status:	CF	
Source:	PH	
Paytype:	BI	
Rate:	LG	
Cost EXC GST:	-46.33	
Tax:	0.00	
Total Charge:	-46.33	

Printed on: 04/12/2024 15:41:35
Printed by: BRREMFROE

2nd App submission 4/12/2024

Monday, August 19, 2024 9:35 AM

Andrews, Edward S <edward.s.andrews@wv.gov>

[REO Processing Inc.; Huntington, WV]

1 message

Schweder, Lisa <Lisa.Schweder@terracon.com> Fri, Apr 12, 2024 at 12:43 PM
To: "DEPAirQualityPermitting@wv.gov" <DEPAirQualityPermitting@wv.gov>
Cc: Gregg Frazier <gregg.frazier@reoprocessing.com>, "Barrow, Liz R" <Liz.Barrow@terracon.com>, "Andrews, Edward S" <edward.s.andrews@wv.gov>

Good afternoon,

Please find the updated Air Permit Application in Huntington, WV for REO Processing Inc. attached.

Thank you,

Lisa Schweder, E.I.T.
Staff Environmental Engineer I Environmental Services

Terracon

800 Morrison Road I Columbus, Ohio 43230

M (614) 256-0363

Lisa.Schweder@terracon.com I Terracon.com

CELEBRATING OVER 30 YEARS IN COLUMBUS

REO Huntington Air Permit Rev 2 Signed.pdf
3319K

Dust Control Plan Approval 4/12/2024

Monday, August 19, 2024 9:19 AM

Andrews, Edward S <edward.s.andrews@wv.gov>

RE: Dust Control Rev 8

1 message

Gregg Frazier <gregg.frazier@reoprocessing.com> Fri, Apr 12, 2024 at 9:10 AM
To: "Robertson, James" <james.robertson@wv.gov>
Cc: "Coccari, Gene M" <gene.m.coccari@wv.gov>, Edward S Andrews <edward.s.andrews@wv.gov>

Thank you

Thank you for your time,

Gregg G. Frazier

President

REO Processing, Inc.

www.reoprocessing.com

304-464-5444 (o)

937-545-8521 (m)

From: Robertson, James <james.robertson@wv.gov>
Sent: Friday, April 12, 2024 9:03 AM
To: Gregg Frazier <gregg.frazier@reoprocessing.com>
Cc: Coccari, Gene M <gene.m.coccari@wv.gov>; Edward S Andrews <edward.s.andrews@wv.gov>
Subject: Re: Dust Control Rev 8

Mr. Frazier,

The Division of Air Quality has reviewed and approved REO's Dust Control Plan Rev 8, with an effective approval date of April 12, 2024.

Please submit this approved plan with your permit application.

Should you have questions or need additional information, just let me know.

Regards,

James P. Robertson

Supervisor, Compliance & Enforcement

WVDEP – Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

James.Robertson@wv.gov

Phone: (304) 414-1903

On Tue, Apr 9, 2024 at 10:51 AM Gregg Frazier <gregg.frazier@reoprocessing.com> wrote:

> Sorry, there was a typo on the facility map.
>
> Thank you for your time,
>
> *Gregg G. Frazier*
>
> *President*
>
> *REO Processing, Inc.*
>
> *www.reoprocessing.com*
>
> 304-464-5444 (o)
>
> 937-545-8521 (m)
>
>

Mobile Dust Collector 4/8/2024

Monday, April 8, 2024 12:04 PM

Andrews, Edward S <edward.s.andrews@wv.gov>

RE: Incomplete App Email for Permit App R13-3614/REO Processing Inc.-Huntington

1 message

Schweder, Lisa <Lisa.Schweder@terracon.com>
To: "Andrews, Edward S" <edward.s.andrews@wv.gov>

Will do, thank you!

Lisa Schweder, E.I.T.
Staff Environmental Engineer I Environmental Services

800 Morrison Road I Columbus, Ohio 43230

M (614) 256-0363

Lisa.Schweder@terracon.com I Terracon.com

CELEBRATING OVER 30 YEARS IN COLUMBUS

From: Andrews, Edward S <edward.s.andrews@wv.gov>
Sent: Monday, April 8, 2024 12:00 PM
To: Schweder, Lisa <Lisa.Schweder@terracon.com>
Subject: Re: Incomplete App Email for Permit App R13-3614/REO Processing Inc.-Huntington

Lisa,

It needs to be included in the application.

Thanks

Ed

Edward Andrews, P.E.

Engineer

WVDEP/Division of Air Quality

304-926-0499 Ext 41244

601 57th Street, SE

Charleston, WV 25304

On Mon, Apr 8, 2024 at 11:53 AM Schweder, Lisa <Lisa.Schweder@terracon.com> wrote:

> Good morning Edward,
>
> Quick question. As Gregg was reviewing the REO rail/truck process he came across a mobile bag house unit used in the area (picture attached). Would you like this portable bag house inc states having different requirements regarding portable sources/emission points, and just wanted to confirm what was needed before I add the paperwork.

Thank you!

Lisa Schweder, E.I.T.
Staff Environmental Engineer | Environmental Services

800 Morrison Road | Columbus, Ohio 43230

M (614) 256-0363

Lisa.Schweder@terracon.com | Terracon.com

CELEBRATING OVER 30 YEARS IN COLUMBUS

From: Schweder, Lisa
Sent: Thursday, April 4, 2024 3:36 PM
To: Andrews, Edward S <edward.s.andrews@wv.gov>
Cc: Gregg Frazier <gregg.frazier@reoprocessing.com>; Barrow, Liz R <Liz.Barrow@terracon.com>
Subject: RE: Incomplete App Email for Permit App R13-3614/REO Processing Inc.-Huntington

Good afternoon Edward,

Thank you for reaching out with the list below, we have begun working on it today. Please see my initial answers in red, after discussing with Gregg Frazier. Also, I had one question for clar

Thanks,

Lisa Schweder, E.I.T.
Staff Environmental Engineer | Environmental Services

800 Morrison Road | Columbus, Ohio 43230

M (614) 256-0363

Lisa.Schweder@terracon.com | Terracon.com

CELEBRATING OVER 30 YEARS IN COLUMBUS

From: Andrews, Edward S <edward.s.andrews@wv.gov>
Sent: Thursday, April 4, 2024 9:11 AM
To: Gregg Frazier <gregg.frazier@reoprocessing.com>; hailie.orr@reoprocessing.com; Schweder, Lisa <Lisa.Schweder@terracon.com>
Cc: Beverly D Mckeone <beverly.d.mckeone@wv.gov>; James Robertson <james.robertson@wv.gov>
Subject: Incomplete App Email for Permit App R13-3614/REO Processing Inc.-Huntington

RE: Application Status: Incomplete

REO Processing Inc.

Permit Application No. R13-3614

Plant ID No. 011-00243

Mr. Frazier:

Your submitted application for a modification permit for a material transfer and package facility was received by this Division on March 29, 2024, and assigned application, it has been determined that the application as submitted is incomplete based on the following items:

1. The approved dust control plan as required under Consent Order CO-R13-2023-11 needs to be included in the application. In process – will be sent in one

2. A Corrected legal ad needs to be published. The legal ad needs to disclose the other forms of particulate matter (e.g, Particulate matter less than 10 mic come to the DAQ's attention that Mr. Daniel Isaacs is no longer part of REO Processing's team in West Virginia. The current responsible official of your o address, in this legal ad. The notice needs to indicate the correct type of permit that REO Processing is seeking, which is a construction permit. Please republish application. A copy of the affidavit of publication needs to be forwarded to the DAQ once received from your publisher.

Ad has been corrected to include PM10 and PM2.5 as well as the current responsible official (Gregg Frazier). Will be published asap and affidavit forwarded.

3. All release points, to include vents, need to be identified in Attachment J. Each vent/release point needs to be identified with an individual identification (

Updated- will be sent in one compiled updated application within the next 30 days.

4. Air Pollution Control Device Sheet needs to be assigned to a Control Device ID No. If the same identical control device has multiple different applications forms needs to be complete and annotated for the different applications/locations.

The Air Pollution Control Device Sheet (and app J) for the exhaust fans has been updated now with a Control Device ID No. Regarding the second part of this point about identical control multi-page Air Pollution Control Device Sheet for each control device: 1C, 2C, and 3C (the exhaust fan vents) – 3 total forms in Appendix M. Since there is not an area within these spe devices have, are you wanting us to add description somewhere about the different applications/locations (and therefore, just update the current 3 forms)? Or are you wanting one form for multiple areas and therefore there would be 6 sets of forms for each of the applications (small bagging, bulk loading, bulk unloading, railcar, dump trucks, and exhaust fans)? I would like to

5. Please review the location of the emission sources with associated control devices for these control devices on the provided plot plan for any errors and the application.

Will do. Dust control plan and plot plan will be compared once dust control plan is approved to ensure consistency and Gregg is reviewing one more time to ensure accuracy. Any updates will be sent in

6. Please provide, in detail, how the dust collection ductwork is going to be switched/reconfigured between the emission units (e.g. bulk tanker unloading The DAQ can see how very minor changes would be necessary in operating a pneumatic system (negative pressure/vacuum) to unload tanker trucks & railcars

pneumatic (blower) system would be required to load the railcar. It might be better illustrated to provide a detailed diagram of the pneumatic circuit(s) and the e

Gregg will send you information on this.

7. Is any of the activated carbon received by the facility classified as spent activated carbon?

No

8. Please uncheck modification and check construction on page 1 of 4 of the "Application For NSR Permit" Form.

Completed and updated application form will be in updated application sent within the next 30 days.

Please address the above deficiencies in a revised application within thirty (30) days of the dust control plan being approved by the DAQ (paragraph 8.vi. c review will not commence until the application has been deemed to be technically complete. Failure to respond to this request in a timely manner may result in the deni

Should you have any questions, please contact Ed Andrews at (304) 926-0499 ext. 41244 or reply to this email.

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Edward Andrews, P.E.
Engineer
WVDEP/Division of Air Quality
304-926-0499 Ext 41244
601 57th Street, SE
Charleston, WV 25304