

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on June 18, 2019.

Permit Number: **R30-09300004-2019 (MM03 and MM04)**

Application Received: **May 23, 2023 & June 22, 2023**

Plant Identification Number: **03-54-093-00004**

Permittee: **Kingsford Manufacturing Company**

Facility Name: **Parsons Plant**

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

Permit Action Number: *MM03 and MM04* Revised: *January 3, 2024*

Physical Location:	Parsons, Tucker County, West Virginia
UTM Coordinates:	613.20 km Easting • 4,326.20 km Northing • Zone 17
Directions:	Take Route 219 North of Elkins. The plant is located about 2 miles South of Parsons on Route 219.

Facility Description

The Kingsford Manufacturing Company Parsons Plant is a charcoal manufacturing facility. It manufactures charcoal briquets from raw materials including wood/sawdust, char produced on-site and received from the Beryl plant, coal, limestone, sodium nitrate, starch, borax, and solvent for briquets.

Facility SIC Code: 2861 Chemicals and allied products - gum and wood chemicals.

Emissions Summary

There is no change in emissions because of these modifications.

Title V Program Applicability Basis

With the proposed changes associated with these modifications, this facility maintains the potential to emit 250.79 TPY of Nitrogen Oxides and 191.62 TPY of PM10. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Kingsford Manufacturing Company's Parsons Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modifications to this facility have been found to be subject to the following applicable rules:

Federal and State:	45CSR7	To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations
	45CSR13	NSR Permits
	45CSR30	Operating permit requirement.
State Only:	N/A	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1608M	July 10, 2023	
R14-0001E	August 14, 2023	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

This permitting action includes changes from two minor modifications (MM03 and MM04):

- ❖ Minor modification (MM03) incorporates changes from R13-1608M. Changes associated with this modification include updates to the Lime Use Tank (E-06-09) and the Char and Coal Truck Dumping station (E-02-09).

Lime Use Tank (E-06-09)

Kingsford is replacing the existing bin fabric filter (C-15 - Adaptive Engineering FRC-9X27, 600 cfm) on the Lime Use Tank (E-06-09) with a new fabric filter of similar size (Schenck Process 39AVRC14, Style II, 560 cfm). The only other change to the existing equipment is that the lime use bin fabric filter's drop duct (drops collected dust into the manufacturing operations) chute will be upsized from 26" to 40" to improve blow back. The only change in emissions from these modifications will be a small paper reduction as the maximum flow rate through the fabric filter decreases from 600 cfm to 560 cfm (outlet emission factor of 0.01 gr/scf will not change). The above changes were updated in the Emission Units Table of the Title V Permit and condition 3.1.14 was also revised.

Char and Coal Truck Dumping (E-02-09)

Kingsford currently can receive char and coal via an existing hydraulically elevated Truck Dumping Station (E-02-09) controlled by a wet scrubber (C-34). Kingsford plans to replace the existing truck dumping station with a new dumping station. The new dumping station will be functionally the same as the existing truck dumping station but will be equipped with a receiving bin that will allow drivers to dump their own trucks. The new truck dump will be in the same location as the existing truck dump and will be controlled by the existing wet scrubber (C-34). This physical modification will result in no emissions change and no changes to the Title V Permit.

- ❖ Minor modification (MM04) incorporates changes from R14-0001E. This modification is to improve the solvent application system in the Solvent Treated Briquets (STB) operations (E-05-01). Solvent is added to the charcoal to aid in lighting the charcoal. The solvent applied is a petroleum-based product that is considered 100% VOCs but does not, according to information supplied by Kingsford, contain any Hazardous Air Pollutants (HAPs).

The solvent application system in the Solvent Treated Briquets (STB) operations (E-05-01) was updated in the Emission Units Table of the Title V Permit. There is no change in the facility-wide potential-to-emit (PTE) as a result of the changes proposed herein.

Minor Modification (MM04) results in the following changes to the Title V permit:

- Since conditions 3.1.9, 3.1.11, 3.1.12, 3.1.13, 3.1.14 and 3.1.15 were not included in R14-0001E, citations of those conditions were updated.
- R14-0001E, condition 3.2.1(Emission Limit Averaging Time) was added as 3.2.7 of this permit.
- Citations in conditions 3.4.1, 3.4.5 and 3.4.6 were revised.
- Condition 7.1.9: 45CSR7 requirements were not included in R14-0001E, so R14-0001E condition 4.1.9 was added in its place.
- Conditions 7.1.1 through 7.1.8, 7.3.1, 7.4.1, 7.4.2, 7.4.3 and 7.5.1 were revised.
- R14-0001E, condition 4.3.1 was added as condition 7.3.3 of this permit.
- Condition 3.5.8.a.1. of this permit is reserved now, therefore, condition 7.5.2 was deleted.

- Attachment 1 of this permit was updated as Appendix A: R14-0001E. Additionally, changes were made to the formula used to calculate VOC emissions from STB briquet fines.

- ❖ Changes to boilerplate conditions 2.1.3, 2.11.4, 2.17, 2.22.1, 3.5.4, 3.5.7., 3.5.8.a.1, and 3.5.8.a.2 were included with these modifications.

Non-Applicability Determinations

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

None

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A

Ending Date: N/A

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41283
Beena.j.modi@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.