

Fact Sheet



*For Final Renewal Permitting Action Under 45CSR30
and
Title V of the Clean Air Act*

Permit Number: **R30-05700003-2023**
Application Received: **August 16, 2022**
Plant Identification Number: **05700003**
Permittee: **Kingsford Manufacturing Company**
Facility Name: **Beryl Plant**
Mailing Address: **180 Kingsford Lane, Parsons, WV 26287**

Physical Location: 3798 Beryl Road, Piedmont, Mineral County, West Virginia
UTM Coordinates: 666.0 km Easting • 4371.0 km Northing • Zone 17
Directions: The Facility is located adjacent to WV Route 46 in Mineral County near the WV - Maryland border just west of the town of Luke, MD.

Facility Description

The Kingsford Manufacturing Company Beryl Plant produces char from bark and sawdust raw materials. The bark and sawdust is sized, dried in a rotary dryer and then charred in a multi-hearth retort furnace. The dryer and the furnace air emissions are controlled by cyclone collectors which are exhausted to a common after combustion chamber (ACC) for oxidation. Air emissions from the ACC stack are subject to emissions limits in Permit R13-2117F. The char is quenched and conveyed into covered trucks for transport to the Kingsford Parsons, WV plant for charcoal manufacturing.

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

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2022 Actual Emissions
Carbon Monoxide (CO)	33.44	0.76
Nitrogen Oxides (NO _x)	209.17	38.0
Lead	0.01	< 0.01
Particulate Matter (PM _{2.5})	80.87	4.97
Particulate Matter (PM ₁₀)	112.09	22.20
Total Particulate Matter (TSP)	168.30	63.25
Sulfur Dioxide (SO ₂)	48.01	10.92
Volatile Organic Compounds (VOC)	9.33	0.28
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2022 Actual Emissions
Methanol	0.11	0.08

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

Title V Program Applicability Basis

This facility has the potential to emit 209.17 TPY of Nitrogen Oxides and 112.09 TPY of PM₁₀. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Kingsford Manufacturing Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

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

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

Federal and State:	45CSR2	PM emissions from combustion of fuel in indirect heat exchanger
	45CSR6	Open burning prohibited.
	45CSR7	Fugitive dust, particulate matter, and visible emissions
	45CSR10	Sulfur dioxide emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for sources
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40CFR60
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting
	45CSR30	Operating permit requirement
	45CSR34	Emission Standards for Hazardous Air Pollutants

40 C.F.R. Part 61	Asbestos inspection and removal
40 C.F.R. Part 60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
40 C.F.R. Part 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
40 C.F.R. Part 64	Compliance Assurance Monitoring (CAM) Plans
40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only: 45CSR4	No objectionable odors.

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

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

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2117F	October 18, 2019	
G60-C047	August 17, 2012	

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

Determinations and Justifications

Since the previous permit renewal (issued 03/19/2018) there was a minor permit modification MM01 (issued 03/17/2020) based on permit R13-2117F to modify the wood pile management operations (E-01-01 and E-01-02), and to install a new wood chip (Hogfuel) truck receipt system (E-01-03) which allows receipt of Hogfuel materials via a new truck unloader. Also, one upper 40 mMBTU/hr After Combustion Chamber (ACC) burner (E-03-02) was converted to combust natural gas instead of propane (permit determination PD20-107 was submitted on 11/17/2020, and "No Permit needed" letter was issued on 12/07/2020). There were also the following changes made to the permit:

1. Section 1.0 – Emission Units Table 1.1 was revised to change details for emission unit 003-02 to reflect the current configuration of the two (2) low NOx retort burners (as per permit renewal application): (1) 40 MMBtu/hr low NOx propane burner installed in 2015 and modified in 2017, and one (1) 40 MMBtu/hr low NOx natural gas burner installed in 2017 and modified in 2020.
2. Sections 2.0 and 3.0 - permit boilerplate was revised.
3. Section 8.0 – updated applicable requirements of 40 C.F.R 60 Subpart JJJJ (8.2.3, 8.2.5, 8.4.1 and 8.5.2).

Non-Applicability Determinations

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

Requirement	Regulatory Citation	Basis for Non-Applicability
PM emissions from Coal Preparation and Handling Plants	45CSR5	No coal handling operations at Beryl facility.
PM emissions from an incinerator	45CSR§6-4.1	The PM emission standard from 45CSR7 (45CSR§7-4.1) also applies and is more stringent. Because of the "inconsistency between rules" provision in 45CSR6 and 7, the more stringent rule will apply and therefore the PM standard from 45CSR6 is moot and the Permit Shield applies.
Opacity limits for an incinerator	45CSR§§6-4.3 and 4.4	The opacity standard from 45CSR7 (45CSR§§7-3.1 and 3.2) also applies and is more stringent. Because of the "inconsistency between rules" provision in 45CSR6 and 7, the more stringent rule will apply and therefore the opacity requirement from 45CSR6 is moot and the Permit Shield applies.
Type "d" chemical operation source	45CSR7, Table 45-7A	This facility was previously determined by the Director as type "a" source, not a type "d" source
Testing, Monitoring, Recordkeeping and Reporting of Sulfur Oxides emissions	45CSR§10-8	Per 45CSR§10-10.3 partial wood combustion during the manufacture of charcoal shall be exempt from this requirement
Preparation of standby plans for reducing the emissions of air pollution during periods of an Air Pollution Alert, Air pollution Warning, and Air pollution Emergency	45CSR§11-5.1	This facility is not in Priority I or II regions, therefore it is not subject to this requirement
PSD source	45CSR14	Emission limits and production caps are accepted by the facility to avoid triggering PSD
Fugitive emissions from material handling	45CSR17	Per 45CSR§17-6.1 if sources are subject to 45CSR7 they are exempt from the requirements of this Rule
NSR permitting for non-attainment areas	45CSR19	Beryl facility is not in affected areas
VOC emissions regulations	45CSR21	Beryl facility is not in affected areas
Emissions of toxic air pollutants	45CSR27	Beryl facility does not operate any "chemical processing units" and does not use listed chemicals
Federal Acid Rain provisions	45CSR33 Title IV of CAAA	No affected sources at Beryl facility
Control of Ozone Season Nitrogen Oxide Emissions	45CSR40	No affected sources at Beryl facility
Regional Haze Rule	40CFR§§51.300-309	Beryl facility was constructed prior to 1977, but it doesn't have PTE for any affected pollutant exceeding 250 TPY
40 C.F.R. Part 63	Subpart JJJJJ	There are no affected sources at this facility. Boiler 006-02 is natural gas fired, therefore it is not subject to this rule.

Requirement	Regulatory Citation	Basis for Non-Applicability
Compliance Assurance Monitoring (CAM) Rule	40CFR64	Cyclones C-05, C-06 and C-07 are used primarily for product recovery, therefore they are defined as “inherent process equipment” per 40CFR§64.1, and do not require a CAM plan.

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: May 26, 2023

Ending Date: June 26, 2023

Point of Contact

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

Natalya V. Chertkovsky-Veselova
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41250
natalya.v.chertkovsky@wv.gov

Procedure for Requesting Public Hearing

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

Response to Comments (Statement of Basis)

Not applicable.