

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(MM02)**
Application Received: **August 24, 2022**
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: *MM02* Revised: *November 29, 2022*

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.

This modification is to replace a component of the current retort char pneumatic transfer system (E-06-05). The system currently includes two (2) retort char transfer bins controlled by a venturi scrubber (C-38). In the current configuration, the second of the two existing bins transfers char to a pneumatic conveying system via two (2) double flap valves. The second bin and its double flap valves will be replaced by a single duct followed by a screw pump.

The screw pump is expected to be more reliable, but the double flap transfer system will remain on site and may be reinstalled if necessary. The venturi scrubber (C-38) associated with the first bin in the retort char transfer system will remain in operation. The replacement bin and screw pump will not affect the transfer capacity of the char or affect the PTE of any upstream or downstream emission unit.

Emissions Summary

There are no changes to the facility PTE due to this modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, 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 modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Construction permit requirement
	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>)
R13-1608L	September 2, 2022	

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

The following changes were made to the Title V permit as a result of the issuance of R13-1608L.

- Section 1.1 - Changes were made to the equipment description of Emission Unit E-06-05. There is now one retort char bin instead of two.
- Section 1.2 - Updated the active permits list.
- Updated condition 3.1.14 based on changes to the underlying R13-1608L condition 4.1.14.
- Updated condition 3.5.3 with USEPA, Region III's new address.

Non-Applicability Determinations

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

N/A

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: Not Applicable for minor modifications.
Ending Date: N/A

Point of Contact

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41286
Robert.A.Mullins@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.