Received
May 8, 2024
WV DEP/Div of Air Quality

Division of Air Quality Permit Application Submittal

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

- DAQ Facility ID (for existing facilities only): 093-00004
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only): R13-1608M and R30-09300004-2019 (MM03/04)

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

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

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

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

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

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

May 7, 2024

THE CLOROX COMPANY

Ms. Beverly McKeone
Program Manager
Division of Air Quality
West Virginia Department of Environmental Protection
601 57th Street, SE
Charleston, WV 25304

Kingsford Mfg. Company
WV Operations

Re: NSR Class II Administrative Update and Title V Minor Modification to Install Material Handling Operations at the Kingsford Manufacturing Company Parsons, WV Plant
Permit No. R13-1608M and R30-09300004-2019 (MM03/04)

Dear Ms. McKeone:

Kingsford Manufacturing Company (KMC) owns and operates a charcoal briquet manufacturing facility located in Parsons, Tucker County, West Virginia. KMC plans to install new lignite handling operations consisting of a bulk storage tank, a use tank, and associated bin vent filters.

Lignite Coal Storage Tank and Use Tank

KMC intends to install a lignite storage tank (E-06-10) and a lignite use tank (E-06-11). Each will be equipped with a fabric filter. The storage tank will be equipped with a 1,270 cfm fabric filter (C-39) and the use tank will be equipped with a 750 cfm fabric filter (C-40) for control of particulate matter emissions. Lignite will be brought on-site in bulk trucks and then will be pneumatically conveyed to the lignite storage tank (6,000 ft^3). From the lignite storage tank, the lignite will be pneumatically conveyed to the lignite use tank (295 ft^3). From the lignite use tank, the lignite will be added to the existing mixing operations where it will be combined with other materials (e.g., char, lime, starch, etc.) and pressed into briquets. Lignite is being used as a substitute for anthracite coal in the briquet formulation and will be used either as a complete replacement for anthracite or blended with the anthracite to meet formulation requirements. The change is being driven by supply chain issues and elevated market pricing of anthracite coal.

KMC does not anticipate any increase in emissions from this project. As mentioned above, the lignite is being used as a replacement for anthracite. Anthracite is currently received at the facility via a truck dump (E-02-09) and is then mechanically conveyed to a coal storage shed (E-01-02). From the shed, the coal is mechanically conveyed to a coal storage tank (E-06-01). The coal is then screened and mechanically conveyed (E-02-0A) to the mixing and briquetting operations. Unlike the anthracite, the lignite will be not require sizing as it will arrive pre-sized. Also, instead of multiple mechanical conveying/sizing operations required by the anthracite, the lignite will be pneumatically conveyed to storage silos, eliminating the need for a storage pile. Lignite's reduced storage, conveying and sizing requirements will result in less emissions than the processing of anthracite.

WVDEP application forms and supporting information are attached for the proposed modifications to begin in the summer of 2024. If you have any questions or require any additional information, please feel free to contact Eric Copenhaver, Plant Engineering Manager, at (304) 478-5559 or our environmental consultant, Michael Zeiders with Liberty Environmental at (610) 375-9301.

Sincerely,
KINGSFORD MANUFACTURING COMPANY

R. J. Boggs

Robert Boggs
Plant Manager

cc: Eric Copenhaver
Steve Waitman
Dee Stevens
Michael Zeiders – Liberty Environmental
File

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APPLICATION FOR CLASS II ADMINISTRATIVE UPDATE AND TITLE V PERMIT REVISION

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):*
Kingsford Manufacturing Company

2. Federal Employer ID No. ***(FEIN):***
943240524

3. Name of facility *(if different from above):*
Kingsford Manufacturing Company – Parsons Plant

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

5A. Applicant's mailing address:
P.O Box 464

Parsons, WV 26287

5B. Facility's present physical address:
Route 219, about 2 miles south of Parsons

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: Clorox 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: Owner

- 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.): Construction of new lignite handing operations including a lignite storage tank, a lignite use tank, and two (2) associated fabric filters.

10. North American Industry Classification System **(NAICS)** code for the facility:
325191

11A. DAQ Plant ID No. (for existing facilities only):
03-54-09300004

11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):
R30-09300004-2019 (MM03,MM04), R13-1608M, R14-0001E, G60-C012A

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**.

Route 219 North of Elkins. The plant is located about 2 miles South of Parsons on route 219.

12.B. New site address (if applicable):	12C. Nearest city or town: Parsons, WV	12D. County: Tucker
12.E. UTM Northing (KM): 4,326.20	12F. UTM Easting (KM): 613.20	12G. UTM Zone: 17

13. Briefly describe the proposed change(s) at the facility:

Lignite Unloading and Storage

KMC intends to install a lignite storage tank (E-06-10) and a lignite use tank (E-06-11). Each will be equipped with a fabric filter. The storage tank will be equipped with a 1,270 cfm fabric filter (C-39) and the use tank will be equipped with a 750 cfm fabric filter (C-40) for control of particulate matter emissions. Lignite will be brought on-site in bulk trucks and then will be pneumatically conveyed to the lignite storage tank (6,000 ft3). From the lignite storage tank, the lignite will be pneumatically conveyed to the lignite use tank (295 ft3). From the lignite use tank, the lignite will be added to the existing mixing operations where it will be combined with other materials (e.g., char, lime, starch, etc.) and pressed into briquets. Lignite is being used as a substitute for anthracite coal in the briquet formulation and will be used either as a complete replacement for anthracite or blended with the anthracite to meet formulation requirements. The change is being driven by supply chain issues and elevated market pricing of anthracite coal.

14A. Provide the date of anticipated installation or change: Beginning Summer 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: Summer 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 24 Days Per Week 7 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). $300 for Class II Administrative Amendment

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	☐ Storage Tanks
☐ Grey Iron and Steel Foundry	☐ Indirect Heat Exchanger	

☒ General Emission Unit, specify:

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

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 R.J. Boggs *(Please use blue ink)* DATE: 05/07/2024 *(Please use blue ink)*

35B. Printed name of signee: Robert Boggs		35C. Title: Plant Manager
35D. E-mail: bobby.boggs@clorox.com	36E. Phone: 304-478-5530	36F. FAX: 304-478-2129
36A. Printed name of contact person (if different from above): Eric Copenhaver		36B. Title: Plant Engineering Manager
36C. E-mail: eric.copenhaver@clorox.com	36D. Phone: (304) 478-5559	36E. FAX: (304) 478-2129

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 A
CURRENT BUSINESS CERTIFICATE

WEST VIRGINIA
STATE TAX DEPARTMENT
BUSINESS REGISTRATION CERTIFICATE

ISSUED TO:
KINGSFORD MANUFACTURING COMPANY
RT 219 SOUTH
PARSONS, WV 26287

BUSINESS REGISTRATION ACCOUNT NUMBER: **1052-8044**

This certificate is issued on: 06/14/2010

This certificate is issued by
the West Virginia State Tax Commissioner
in accordance with W.Va. Code § 11-12.

The person or organization identified on this certificate is registered to conduct business in the State of West Virginia at the location above.

This certificate is not transferrable and must be displayed at the location for which issued.

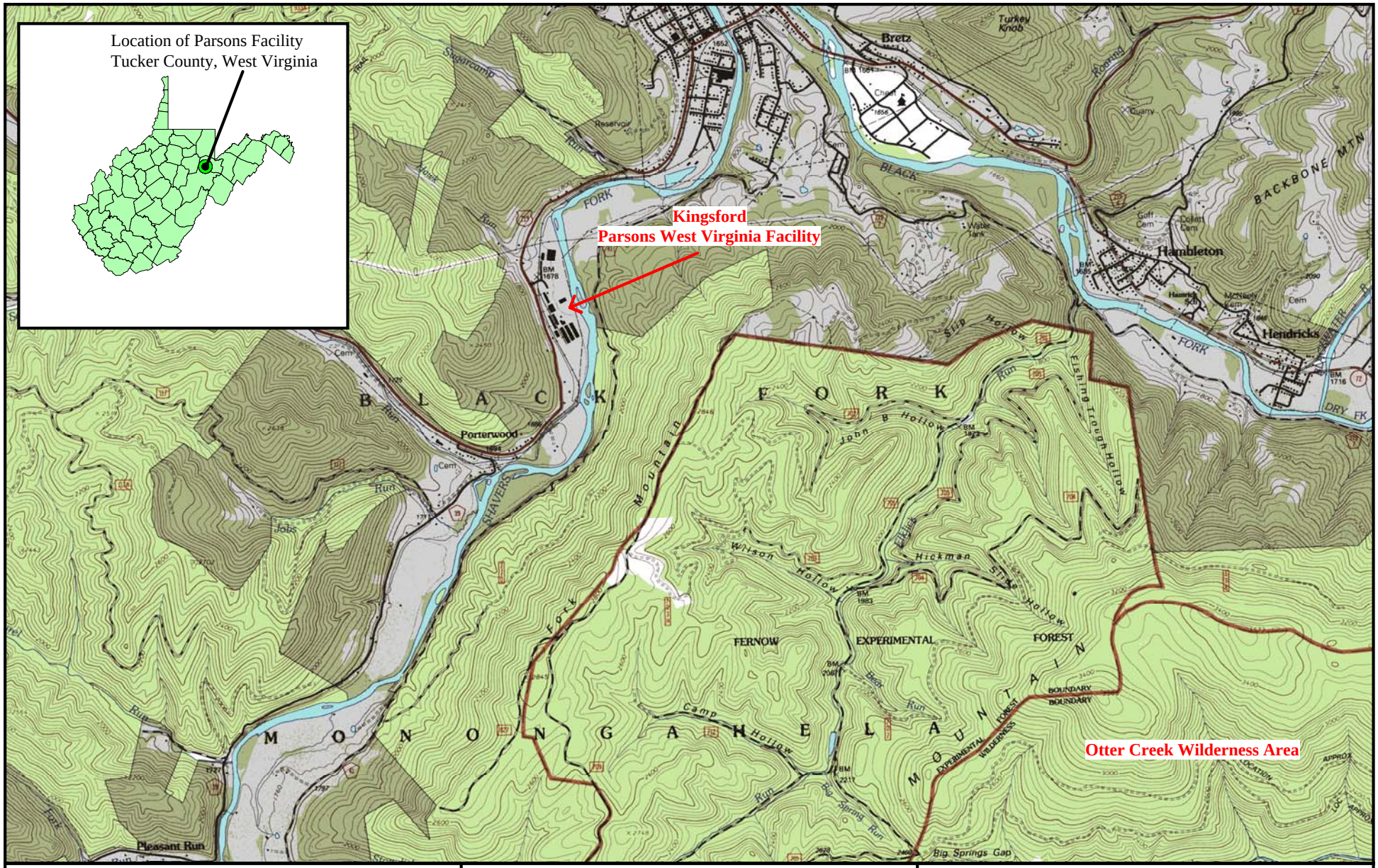
This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them. CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia.

atL006 v.1
L1485527808

ATTACHMENT B
AREA MAP



Attachment B
Kingsford Manufacturing Company
Parson, WV Facility

ATTACHMENT C
INSTALLATION AND STARTUP SCHEDULE

Attachment C

Installation/Startup Schedule

(includes all emission units and air pollution control devices that will be part of this permit application review, regardless of permitting status)

Emission Unit ID[1]	Emission Point ID[2]	Emission Unit Description	Date of Modification	Date of Startup	Type of Change	Control Device[3]
Install a new lignite storage tank, a new lignite use tank, and two (2) fabric filters.						
E-06-10	S-39	Lignite storage tank	Summer 2024	Summer 2024	Install new lignite storage tank	Fabric Filter (C-39)
E-06-11	S-40	Lignite use tank	Summer 2024	Summer 2024	Install new lignite use tank	Fabric Filter (C-40)

[1] For Emission Units (or Sources) use the following numbering system:1S, 2S, 3S,... or other appropriate designation.
[2] For Emission Points use the following numbering system:1E, 2E, 3E, ... or other appropriate designation.
[3] For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

ATTACHMENT D
REGULATORY DISCUSSION

ATTACHMENT D – REGULATORY DISCUSSION

Lignite Storage Tank and Use Tank

KMC intends to install a lignite storage tank (E-06-10) and a lignite use tank (E-06-11). Each will be equipped with a fabric filter. The storage tank will be equipped with a 1,270 cfm fabric filter (C-39) and the use tank will be equipped with a 750 cfm fabric filter (C-40) for control of particulate matter emissions. Lignite will be brought on-site in bulk trucks and then will be pneumatically conveyed to the lignite storage tank (6,000 ft^3). From the lignite storage tank, the lignite will be pneumatically conveyed to the lignite use tank (295 ft^3). From the lignite use tank, the lignite will be added to the existing mixing operations where it will be combined with other materials (e.g., char, lime, starch, etc.) and pressed into briquets. Lignite is being used as a substitute for anthracite coal in the briquet formulation and will be used either as a complete replacement for anthracite or blended with the anthracite to meet formulation requirements. The change is being driven by supply chain issues and elevated market pricing of anthracite coal.

CAM

Pre-control emissions for each operation are less than applicable thresholds so the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 are not applicable.

NSR/PSD

The neither of the operations are significant emissions sources. Potential PM emissions are less than 1.0 tpy. The modification will not impact upstream material handling operations or downstream briquet production operations that are subject to throughput and emissions caps imposed in previous air permits to avoid NSR/PSD applicability.

Existing Title V Permit Conditions

The Parsons Title V operating permit (R30-09300004-2019 MM03/04), Section 3.0 "Facility Wide Requirements" of the permit identifies applicable emissions limitations and standards (particulate matter emissions, visible emissions, etc.) for material handling operations. KMC will continue to comply with the monitoring, recordkeeping, reporting, and testing requirements listed in the existing operating permit. Specific emissions standards follow below:

45CSR5 – Coal Preparation/Handling/Refuse Disposal Areas

Exempt. The operations are subject to 45CSR7

45CSR7 – Particulate Matter Emissions From Manufacturing Processes

The operation will be subject to the requirements of 45CSR7 and the requirements are already included in the current operating permit. The use of fabric filters for control of particulate matter will ensure compliance with these standards

45CSR17 – Fugitive Emissions From Material Handling

Exempt. The operations are subject to 45CSR7.

New Source Performance Standards (NSPS) for Coal Preparation and Processing Plants 40 CFR Part 60 Subpart Y

40 CFR 60 Subpart Y applies to "coal preparation and processing plants" which include "one or more of the following processes: breaking, crushing, screening, wet or dry cleaning, and thermal drying... The lignite undergoes none of these processes prior to being mixed with other ingredients and formed into briquets. It arrives on site pre-sized and is pneumatically/mechanically conveyed to the mixing process. Therefore the provisions of 40 CFR 60- Subpart Y do not apply to the lignite handling operations.

ATTACHMENT E
PLOT PLAN

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

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

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

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

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

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

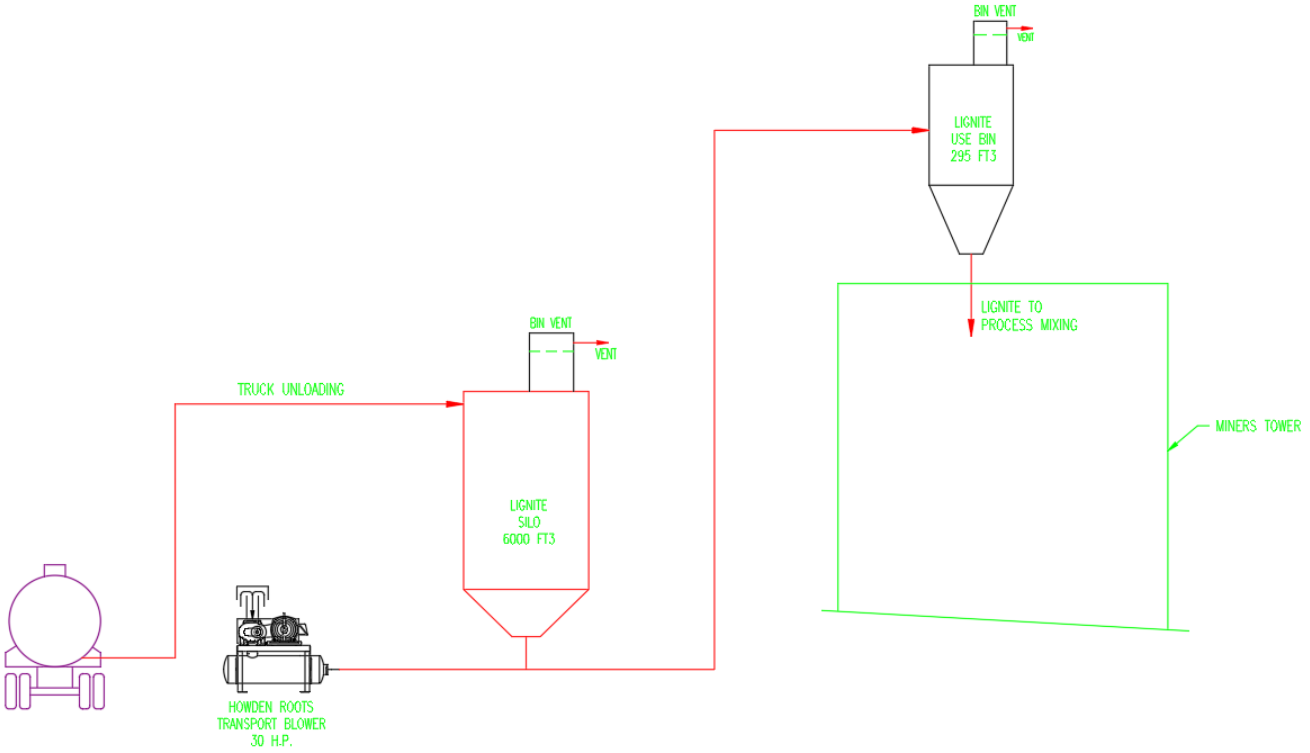
The Kingsford Products Company

TITLE
STACK & FUGITIVE SOURCE LOCATIONS

DIVISION OR SUBSIDIARY
LOCATION PARSONS PLANT

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

ATTACHMENT F
PROCESS FLOW DIAGRAM



Attachment F-1
Lignite Handling System
Process Flow Diagram
Kingsford Manufacturing Co.
Parsons, WV Plant

ATTACHMENT G
PROCESS DESCRIPTION

ATTACHMENT G – PROCESS DESCRIPTION

Kingsford Manufacturing Company (KMC) owns and operates a charcoal briquet manufacturing facility located in Parsons, Tucker County, West Virginia. KMC plans to install new lignite handling operations consisting of a bulk storage tank, a use tank, and associated bin vent filters.

Lignite Storage Tank and Use Tank

KMC intends to install a lignite storage tank (E-06-10) and a lignite use tank (E-06-11). Each will be equipped with a fabric filter. The storage tank will be equipped with a 1,270 cfm fabric filter (C-39) and the use tank will be equipped with a 750 cfm fabric filter (C-40) for control of particulate matter emissions. Lignite will be brought on-site in bulk trucks and then will be pneumatically conveyed to the lignite storage tank (6,000 ft^3). From the lignite storage tank, the lignite will be pneumatically conveyed to the lignite use tank (295 ft^3). From the lignite use tank, the lignite will be added to the existing mixing operations where it will be combined with other materials (e.g., char, lime, starch, etc.) and pressed into briquets. Lignite is being used as a substitute for anthracite coal in the briquet formulation and will be used either as a complete replacement for anthracite or blended with the anthracite to meet formulation requirements. The change is being driven by supply chain issues and elevated market pricing of anthracite coal.

ATTACHMENT H
MSDS INFORMATION

Thermal Coal - Bienfait Mine - Lignite Char

SECTION 1. IDENTIFICATION

Product Identifier	Thermal Coal - Bienfait Mine - Lignite Char
Other Means of Identification	Westmoreland Coal Company
Other Identification	Lignite Char
Product Family	Coal
Manufacturer	Westmoreland Coal Company, P.O.Box: 3000 , Estevan, SK, S4A 2W2, (306)388-2911, westmoreland.com
Emergency Phone No.	Westmoreland Coal Company, (306)388-2911
SDS No.	0525

SECTION 2. HAZARD IDENTIFICATION

Classified according to Canada's Hazardous Products Regulations (WHMIS 2015) and the US Hazard Communication Standard (HCS 2012).

Classification

Eye irritation - Category 2B; Respiratory sensitization - Category 1B; Aquatic hazard (Chronic) - Category 4

Label Elements

Hazard Statement(s):

H320 Causes eye irritation.
H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled.
H413 May cause long lasting harmful effects to aquatic life.

Precautionary Statement(s):

Prevention:

P261 Avoid breathing dust/fume/gas/mist/vapours/spray.
P264 Wash hands and skin thoroughly after handling.
P273 Avoid release to the environment.
P284 [In case of inadequate ventilation] wear respiratory protection (NIOSH approved air-purifying respirator with N100, R100, or P100 filter).

Response:

P304 + P340 IF INHALED: Remove person to fresh air and keep comfortable for breathing.
P304 + P341 IF INHALED: If breathing is difficult, remove person to fresh air and keep comfortable for breathing.
P305 + P351 + P338 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

Disposal:

P501 Dispose of contents and container in accordance with local, regional, national and international regulations.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS No.	%	Other Identifiers
Char		60-100	

SECTION 4. FIRST-AID MEASURES

First-aid Measures

Inhalation

Take precautions to ensure your own safety before attempting rescue (e.g. wear appropriate protective equipment). Move to fresh air. Keep at rest in a position comfortable for breathing. If experiencing respiratory symptoms (e.g. coughing, shortness of breath, wheezing), call a Poison Centre or doctor. Get medical advice or attention if you feel unwell or are concerned.

Skin Contact

Avoid direct contact. Wear chemical protective clothing if necessary. Take off immediately contaminated clothing, shoes and leather goods (e.g. watchbands, belts). Wash gently and thoroughly with lukewarm, gently flowing water and mild soap for 5 minutes.

Eye Contact

Avoid direct contact. Wear chemical protective gloves if necessary. Rinse the contaminated eye(s) with lukewarm, gently flowing water for 5 minutes, while holding the eyelid(s) open. Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

Ingestion

Rinse mouth with water. Do not induce vomiting. If vomiting occurs naturally, lie on your side in the recovery position. Rinse mouth with water again. Get medical advice or attention if you feel unwell or are concerned.

First-aid Comments

Get medical advice or attention if you feel unwell or are concerned. Some of the first-aid procedures recommended here require advanced first-aid training.

SECTION 5. FIRE-FIGHTING MEASURES

Extinguishing Media

Suitable Extinguishing Media

Not combustible. Use extinguishing agent suitable for surrounding fire.

Specific Hazards Arising from the Product

Heating increases the release of toxic vapour.

Special Protective Equipment and Precautions for Fire-fighters

Fight fire from a safe distance or a protected location. For a massive fire, immediately evacuate the area and use unmanned hose holder or monitor nozzles.

SECTION 6. ACCIDENTAL RELEASE MEASURES

Personal Precautions, Protective Equipment, and Emergency Procedures

Use the personal protective equipment recommended in Section 8 of this safety data sheet.

Environmental Precautions

It is good practice to prevent releases into the environment. If the spill is inside a building, prevent product from entering drains, ventilation systems and confined areas. Minimize the use of water to prevent environmental contamination.

Methods and Materials for Containment and Cleaning Up

No special clean-up methods are necessary. Review Section 7 (Handling) of this safety data sheet before proceeding with clean-up.

SECTION 7. HANDLING AND STORAGE

Precautions for Safe Handling

Do not breathe in this product. Prevent all skin contact. Do not get in eyes. Avoid generating dusts. Avoid release to the environment.

Conditions for Safe Storage

Store in an area that is: ventilated, secure and separate from work areas.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Appropriate Engineering Controls

General ventilation is usually adequate. Do not allow product to accumulate in the air in work or storage areas, or in confined spaces. Use local exhaust ventilation, if general ventilation is not adequate to control amount in the air. Exhaust directly to the outside, taking any necessary precautions for environmental protection.

Individual Protection Measures

Eye/Face Protection

Wear chemical safety goggles and face shield when contact is possible.

Respiratory Protection

Wear a NIOSH approved air-purifying respirator with N100, R100, or P100 filter(s).

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Basic Physical and Chemical Properties

Appearance	Dark black. Particle Size: Not available
Odour	Not available
Odour Threshold	Not available
pH	Neutral
Melting Point/Freezing Point	Not available (melting); Not available (freezing)
Initial Boiling Point/Range	Not available
Flash Point	Not available
Evaporation Rate	Not available
Flammability (solid, gas)	Not applicable (liquid). (Coal)
Upper/Lower Flammability or Explosive Limit	Not available (upper); Not available (lower)
Vapour Pressure	Not available
Vapour Density (air = 1)	Not available
Relative Density (water = 1)	Not available
Solubility	Insoluble in water; Mildly soluble in aromatic hydrocarbons (e.g. toluene).
Partition Coefficient, n-Octanol/Water (Log Kow)	Not available
Auto-ignition Temperature	Not available
Decomposition Temperature	Not available
Viscosity	Not available (kinematic); Not available (dynamic)

Other Information

Physical State	Solid
Molecular Formula	Not available
Molecular Weight	Not available
Bulk Density	Not available
Surface Tension	Not available

Critical Temperature	~ 450 ºC (842 ºF)
Electrical Conductivity	Not available
Vapour Pressure at 50 deg C	Not available
Saturated Vapour Concentration	Not available
Other Physical Property 1	Minimum Expoure Concentration: 100 g/m3
Other Physical Property 2	Specific Gavity: Variable due to prosity

SECTION 10. STABILITY AND REACTIVITY

Reactivity

Not reactive.

Chemical Stability

Normally stable.

Conditions to Avoid

Prolonged exposure to high temperatures.

SECTION 11. TOXICOLOGICAL INFORMATION

Skin Corrosion/Irritation

Not a skin irritant.

Serious Eye Damage/Irritation

Not an eye irritant.

STOT (Specific Target Organ Toxicity) - Single Exposure

Inhalation

(Coal) at high concentrations severe lung injury.

STOT (Specific Target Organ Toxicity) - Repeated Exposure

May cause chronic bronchitis (inflammation of the airways leading to the lungs). In severe cases, permanently decreased lung function may occur. Lung injury. Symptoms may include shortness of breath, chronic cough and weight loss. There may be a decrease in lung function and ability to do some physical activities.

Respiratory and/or Skin Sensitization

Respiratory sensitizer. Human experience shows severe asthma or asthma-like symptoms (respiratory sensitization) in rare cases following exposure at work.

Key to Abbreviations

ACGIH® = American Conference of Governmental Industrial Hygienists. A5 = Not suspected as a human carcinogen. IARC = International Agency for Research on Cancer. Group 4 = Probably not carcinogenic to humans.

Reproductive Toxicity

Development of Offspring

Does not cause harm to the unborn child.

Sexual Function and Fertility

Does not cause effects on sexual function or fertility.

Effects on or via Lactation

Does not cause effects on or via lactation.

Germ Cell Mutagenicity

Not mutagenic.

Interactive Effects

No information was located.

SECTION 12. ECOLOGICAL INFORMATION

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal Methods

Dispose of contents and container in accordance with local, regional, national and international regulations.

SECTION 14. TRANSPORT INFORMATION

Not regulated under Canadian TDG regulations. Not regulated under US DOT Regulations.

Special Precautions Not applicable

Transport in Bulk According to Annex II of MARPOL 73/78 and the IBC Code

Not applicable

Proof of Dangerous Goods Classification

Date of Classification	July 21, 2017
Technical Name	Coal
Classification Method	LABORATORY REPORT

SECTION 15. REGULATORY INFORMATION

Safety, Health and Environmental Regulations

Canada

WHMIS 1988 Classification

Class D2A; D2B

D2A - Very Toxic (Respiratory tract sensitization); D2B - Toxic (Eye irritant)

Domestic Substances List (DSL) / Non-Domestic Substances List (NDSL)

Not listed on the DSL or NDSL.

USA

Toxic Substances Control Act (TSCA) Section 8(b)

Exempt from TSCA Inventory requirements.

SECTION 16. OTHER INFORMATION

SDS Prepared By	AGAT Laboratories Ltd
Phone No.	(403)299-2000
Date of Preparation	July 21, 2017
Key to Abbreviations	ACGIH® = American Conference of Governmental Industrial Hygienists AIHA® = AIHA® Guideline Foundation. HSDB® = Hazardous Substances Data Bank IARC = International Agency for Research on Cancer NFPA = National Fire Prevention Association NIOSH = National Institute for Occupational Safety and Health NTP = National Toxicology Program OSHA = US Occupational Safety and Health Administration RTECS® = Registry of Toxic Effects of Chemical Substances
References	CHEMINFO database. Canadian Centre for Occupational Health and Safety (CCOHS). HSDB® database. US National Library of Medicine. Available from Canadian Centre for Occupational Health and Safety (CCOHS). NIOSH Pocket Guide database. National Institute for Occupational Safety and Health. Available from Canadian Centre for Occupational Health and Safety (CCOHS). Registry of Toxic Effects of Chemical Substances (RTECS®) database.

Dassault Systèmes/BIOVIA (“BIOVIA”). Available from Canadian Centre for Occupational Health and Safety (CCOHS). TDG Canada uS DOT uN Model Regulation.

Disclaimer

The information contained herein is based on the information available at the indicated date of preparation but no warranty expressed or implied, is made. Further, the information contained herein relates only to this product or material and may not be valid when used in combination with any other product or material in any process. If the product is not to be used for a purpose or under condition that are normal or reasonably foreseeable, this information cannot be relied upon as complete or applicable. For greater certainty of information, specific uses of the product must be reviewed with the supplier.

ATTACHMENT I
EMISSION UNITS TABLE

Attachment I

Emission Units Table

(includes all emission units and air pollution control devices that will be part of this permit application review, regardless of permitting status)

Emission Unit ID[1]	Emission Point ID[2]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Type[3] and Date of Change	Control Device[4]
E-06-10	S-39	Lignite Storage Tank (New)	2024	6,000 cubic feet	New Installation	1,270 cfm fabric filter dust collector (C-39)
E-06-11	S-40	Lignite Use Tank (New)	2024	295 cubic feet	New Installation	750 cfm fabric filter (C-40)

[1] For Emission Units (or Sources) use the following numbering system:1S, 2S, 3S,... or other appropriate designation.
[2] For Emission Points use the following numbering system:1E, 2E, 3E, ... or other appropriate designation.
[3] New, modification, removal
[4] For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

ATTACHMENT J
EMISSION POINTS DATA SUMMARY SHEET

Attachment J
EMISSION POINTS DATA SUMMARY SHEET

Table 1: Emissions Data

Emission Point ID No. *(Must match Emission Units Table & Plot Plan)*	Emission Point Type[1]	Emission Unit Vented Through This Point *(Must match Emission Units Table & Plot Plan)*		Air Pollution Control Device *(Must match Emission Units Table & Plot Plan)*		Vent Time for Emission Unit *(chemical processes only)*		All Regulated Pollutants - Chemical Name/CAS[3] *(Speciate VOCs & HAPS)*	Maximum Potential Uncontrolled Emissions [4]		Maximum Potential Controlled Emissions [5]		Emission Form or Phase *(At exit conditions, Solid, Liquid or Gas/Vapor)*	Est. Method Used [6]	Emission Concentration [7] (ppmv or mg/m^4)
		ID No.	Source	ID No.	Device Type	Short Term[2]	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
E-06-10	N/D	S-39	Lignite Storage Tank	C-39	1,270 cfm Fabric Filter (C-39	N/A	N/A	PM PM10 PM2.5	See Attachment N				PM/PM10/ PM2.5 – Solid Particulate	EE	N/D
E-06-11	N/D	S-40	Lignite Use Tank	C-40	750 cfm Fabric Filter (C-40)	N/A	N/A	PM PM10 PM2.5	See Attachment N				PM/PM10/ PM2.5 – Solid Particulate	EE	N/D

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit 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). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

[1] Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.

[2] Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).

[3] 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.

[4] Give maximum potential emission 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).

[5] Give maximum potential emission 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).

6 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).

7 Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m^3) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO_2, use units of ppmv (See 45CSR10).

Attachment J
EMISSION POINTS DATA SUMMARY SHEET

Table 2: Release Parameter Data

Emission Point ID No. *(Must match Emission Units Table)*	Inner Diameter (ft.)	Exit Gas			Emission Point Elevation (ft)		UTM Coordinates (km)	
		Temp. (°F)	Volumetric Flow [1] (acfm) *at operating conditions*	Velocity (fps)	Ground Level *(Height above mean sea level)*	Stack Height [2] *(Release height of emissions above ground level)*	Northing	Easting
S-39	TBD	70F	1,270 (Lignite Storage Tank)	N/D	N/D	N/D	N/D	N/D
S-40	TBD	70F	750 (Lignite Use Tank)	N/D	N/D	N/D	N/D	N/D

[1] Give at operating conditions. Include inerts.
[2] Release height of emissions above ground level.

ATTACHMENT K
FUGITIVE EMISSION DATA SUMMARY SHEET (NOT APPLICABLE)

ATTACHMENT L
EMISSIONS UNIT DATA SHEET

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*): E-06-10

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

E-06-10 Lignite Storage Tank (New)

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:

E-06-10 Lignite Storage Tank (New) - 6,000 cu ft capacity. 24 tons/hr (truck to storage tank)

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

E-06-10 Lignite Storage Tank (New) - 6,000 cu ft capacity. 12 tons per hour (storage tank to use tank)

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

Not applicable

* 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): Not applicable

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

(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: × 10^6 BTU/hr.

7. Projected operating schedule:

Hours/Day	24	Days/Week	7	Weeks/Year	52

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used: See Attachment N			
@		°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)		
		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
KMC will monitor visible emissions from the operations in accordance with the requirements of the existing Title V operating permit.	KMC will calculate and record emissions from the operations in accordance with the requirements of the existing Title V operating permit.
REPORTING	**TESTING**
KMC will report emissions from the operations in accordance with the requirements of the existing Title V operating permit.	N/A

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

Not applicable

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*): E-06-11

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

E-06-11 Lignite Use Tank (New)

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:

E-06-11 Lignite Use Tank (New) - 295 cu ft capacity. 12 tons/hr (storage tank to use tank)

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

E-06-11 Lignite Use Tank (New) - 295 cu ft capacity. 6.3 tons/hr (use tank to mixing operations)

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

Not applicable

* 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): Not applicable

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

(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: × 10^6 BTU/hr.

7. Projected operating schedule:

Hours/Day	24	Days/Week	7	Weeks/Year	52

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used: See Attachment N			
@		°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)		
		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
KMC will monitor visible emissions from the operations in accordance with the requirements of the existing Title V operating permit.	KMC will calculate and record emissions from the operations in accordance with the requirements of the existing Title V operating permit.
REPORTING	**TESTING**
KMC will report emissions from the operations in accordance with the requirements of the existing Title V operating permit.	N/A

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

Not applicable

ATTACHMENT M
AIR POLLUTION CONTROL DEVICE SHEET

Attachment M
Air Pollution Control Device Sheet
(BAGHOUSE)

Control Device ID No. (must match Emission Units Table): C-39 (New)

Equipment Information and Filter Characteristics

1. Manufacturer: TBD
   Model No. TBD

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
   - ☐ Wool
   - ☒ Polyester
   - ☐ Polypropylene
   - ☐ Acrylics
   - ☐ Ceramics
   - ☐ Fiber Glass
   - ☐ Cotton Weight ____ oz./sq.yd
   - ☐ Teflon Thickness ____ in
   - ☐ Others, specify

7. Bag Dimension:
   Diameter TBD in.
   Length TBD ft.

8. Total cloth area: 288 ft^2

9. Number of bags: 30

10. Operating air to cloth ratio: 4.41:1 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 TBD in. of water
   - ☐ Frequency if timer actuated
   - ☐ Other

14. Operation Hours: Max. per day: 24; Max. per yr: 8760

15. Collection efficiency: Rating: 99+ %; Guaranteed minimum: 99+ %

Gas Stream Characteristics

16. Gas flow rate into the collector: 1,270 ACFM at 70 °F and N/D PSIA
    ACFM: Design: 1,270 PSIA Maximum: N/D PSIA Average Expected: N/D PSIA

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

18. Gas Stream Temperature: Ambient °F

19. Fan Requirements: ____ hp
    OR 1,270 ft^3/min

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

21. Particulate Loading: Inlet: N/D grain/scf Outlet: 0.01 grain/scf

22. Type of Pollutant(s) to be collected (if particulate give specific type):
Particulate - Lignite

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**	**grains/acf**	**lb/hr**	**grains/acf**
PM/PM10/PM2.5	1.09	0.1	0.11	0.01

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	N/D	
2 – 4		
4 – 6		
6 – 8		
8 – 10		
10 – 12		
12 – 16		
16 – 20		
20 – 30		
30 – 40		
40 – 50		
50 – 60		
60 – 70		
70 – 80		
80 – 90		
90 – 100		
>100		

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:
N/A

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:
Returned to process

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: KMC will monitor visible emissions from the operations in accordance with the requirements of the existing Title V operating permit.	RECORDKEEPING: KMC will calculate and record emissions from the operations in accordance with the requirements of the existing Title V operating permit.
REPORTING: KMC will report emissions from the operations in accordance with the requirements of the existing Title V operating permit.	TESTING: N/A

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.
N/A. Estimated to be 100%. Pneumatic conveying system.

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

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): C-40 (New)

Equipment Information and Filter Characteristics

1. Manufacturer: TBD
   Model No. TBD

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 ☐ Wool
   ☐ Polyester ☐ Polypropylene
   ☐ Acrylics ☐ Ceramics
   ☐ Fiber Glass
   ☐ Cotton Weight oz./sq.yd
   ☐ Teflon Thickness in
   ☒ Others, specify pleated polyester

7. Bag Dimension:
   Diameter TBD in.
   Length TBD ft.

8. Total cloth area: 488 ft²

9. Number of bags: 12

10. Operating air to cloth ratio: 1.54:1 ft/min

11. Baghouse Operation: ☒ Continuous ☐ Automatic ☐ Intermittent

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

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

14. Operation Hours: Max. per day: 24 Max. per yr: 8760

15. Collection efficiency: Rating: 99+ % Guaranteed minimum: 99+ %

Gas Stream Characteristics

16. Gas flow rate into the collector: 750 ACFM at 70 °F and N/D PSIA
    ACFM: Design: 750 PSIA Maximum: N/D PSIA Average Expected: N/D PSIA

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

18. Gas Stream Temperature: Ambient °F

19. Fan Requirements: hp
    OR 750 ft³/min

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

21. Particulate Loading: Inlet: N/D grain/scf Outlet: 0.01 grain/scf

22. Type of Pollutant(s) to be collected (if particulate give specific type):
Particulate - Lignite

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**	**grains/acf**	**lb/hr**	**grains/acf**
PM/PM10/PM2.5	0.64	0.1	0.064	0.01

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	N/D	
2 – 4		
4 – 6		
6 – 8		
8 – 10		
10 – 12		
12 – 16		
16 – 20		
20 – 30		
30 – 40		
40 – 50		
50 – 60		
60 – 70		
70 – 80		
80 – 90		
90 – 100		
>100		

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:
N/A

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:
Returned to process

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: KMC will monitor visible emissions from the operations in accordance with the requirements of the existing Title V operating permit.	RECORDKEEPING: KMC will calculate and record emissions from the operations in accordance with the requirements of the existing Title V operating permit.
REPORTING: KMC will report emissions from the operations in accordance with the requirements of the existing Title V operating permit.	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 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.
N/A. Estimated to be 100%. Pneumatic conveying system.

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

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

ATTACHMENT N
SUPPORTING EMISSION CALCULATIONS

TABLE N-1
LIGNITE STORAGE/USE TANKS - POTENTIAL POST-CONTROL EMISSIONS
KINGSFORD MANUFACTURING COMPANY - PARSONS, WV

Source ID	Emission Point ID	Equipment Description and ID	Year Installed/ Modified	Design Capacity or Allowable Limit	Control Device Description and ID[1]	Operating Schedule	Exhaust Flowrate	$PM/PM_{10}/PM_{2.5}$ Emission Factor	$PM/PM_{10}/PM_{2.5}$ Emissions	
						hr/yr	scfm	gr/scf	lb/hr	ton/yr
E-06-10	S-39	Lignite Storage Tank	2024	24 tph	Fabric Filter Dust Collector (C-39)	8,760	1,270	0.01	0.1089	0.477
E-06-11	S-40	Lignite Use Tank	2024	12 tph	Fabric Filter Dust Collector (C-40)	8,760	750	0.01	0.0643	0.282
Total									0.1731	0.758

Hourly and Annual PM emissions assume constant char transfer for 8,760 hr/yr. All PM assumed to be $PM_{2.5}$ after the fabric filter.

TABLE N-2
LIGNITE STORAGE/USE TANKS - POTENTIAL PRE-CONTROL EMISSIONS
KINGSFORD MANUFACTURING COMPANY - PARSONS, WV

Source ID	Emission Point ID	Equipment Description and ID	Year Installed/ Modified	Design Capacity or Allowable Limit	Control Device Description and ID[1]	Operating Schedule	Exhaust Flowrate	$PM/PM_{10}/PM_{2.5}$ Emission Factor	$PM/PM_{10}/PM_{2.5}$ Emissions	
						hr/yr	scfm	gr/scf	lb/hr	ton/yr
E-06-10	S-39	Lignite Storage Tank	2024	24 tph	Fabric Filter Dust Collector (C-39)	8,760	1,270	0.10	1.0886	4.768
E-06-11	S-40	Lignite Use Tank	2024	12 tph	Fabric Filter Dust Collector (C-40)	8,760	750	0.10	0.6429	2.816
Total									1.7314	7.584

Hourly and Annual PM emissions assume constant char transfer for 8,760 hr/yr. All PM assumed to be $PM_{2.5}$.

ATTACHMENT O
MONITORING/RECORDKEEPING PLANS - NOT APPLICABLE

ATTACHMENT P
CLASS I LEGAL ADVERTISEMENT

EXAMPLE LEGAL ADVERTISEMENT

Publication of a proper Class I legal advertisement is a requirement of the application process. In the event the applicant's legal advertisement fails to follow the requirements of 45CSR 13 (45-13-8) or the requirements of Chapter 59, Article 3, of the West Virginia Code, the application will be considered incomplete and no further review of the application will occur.

The applicant, utilizing the format for the Class I legal advertisement appearing below, shall cause such legal advertisement to appear a minimum of one (1) day in the newspaper most commonly read in the area where the facility exists or will be constructed. The notice must be published no earlier than five (5) working days of receipt by this office of your application. The original affidavit of publication must be received by this office no later than the last day of the public comment period.

The advertisement shall contain, at a minimum, the name of the applicant, the type and location of the source, the type and amount of air pollutants that will be discharged, the nature of the permit being sought, the proposed start-up date for the source and a contact telephone number for more information.

The location of the source should be as specific as possible starting with: 1.) the street address of the source; 2.) the nearest street or road; 3.) the nearest town or unincorporated area, 4.) the county, and 5.) latitude and longitude coordinates.

Types and amounts of pollutants discharged must include all regulated pollutants (PM, PM_{10}, VOC, SO_2, Xylene, etc.) and their potential to emit or the permit level being sought in units of tons per year (including fugitive emissions).

In the event the 30th day is a Saturday, Sunday, or legal holiday, the comment period will be extended until 5:00 p.m. on the following regularly scheduled business day.

AIR QUALITY PERMIT NOTICE
Notice of Application

Notice is given that **The Kingsford Manufacturing Company** has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a **Class II Administrative Update** for **a lignite storage silo and a lignite use bin, each equipped with a fabric filter** located on **Route 219, two miles South of Parsons, WV**, in **Tucker** County, West Virginia. The latitude and longitude coordinates are: **39.079883 and -79.691224.**

The applicant estimates the potential to discharge the following Regulated Air Pollutants will be:

PM/PM10/PM2.5	0.76 tons per year

The applicant estimates there will be no net increased potential to discharge Regulated Air Pollutants as a result of this project.

Startup of operation is planned to begin on or about the **1st** day of **September**, **2024**. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice. Written comments will also be received via email at DEPAirQualityPermitting@WV.gov.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 41281, during normal business hours.
Dated this the **(Day)** day of **(Month)**, **(Year)**.

By: **Kingsford Manufacturing Company**
Robert Boggs
Plant Manager
P.O. Box 464

Parsons, WV 26287

ATTACHMENT Q
BUSINESS CONFIDENTIALITY CLAIMS - NOT APPLICABLE

ATTACHMENT R
AUTHORITY OF CORPORATION

KINGSFORD MANUFACTURING COMPANY

DELEGATION OF SIGNATURE AUTHORITY

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

Robert Boggs
Parsons Plant; Parsons, West Virginia

Documents and Authority:

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

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

Dated: November 1, 2021

Iké Adeyemi
Vice President – Secretary

ATTACHMENT S
TITLE V PERMIT REVISION INFORMATION

Attachment S

Title V Permit Revision Information

1. New Applicable Requirements Summary

Mark all applicable requirements associated with the changes involved with this permit revision: .

☐ SIP	☐ FIP
☐ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR15)	☐ Nonattainment NSR (45CSR19)
☐ Section 111 NSPS (Subpart(s)_	☐ Section 112(d) MACT standards (Subpart(s)_____)
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☐ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64) (1)
☐ NO_x Budget Trading Program Non-EGUs (45CSR1)	☐ NO_x Budget Trading Program EGUs (45CSR26)

(1) If this box is checked, please include **Compliance Assurance Monitoring (CAM) Form(s)** for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why **Compliance Assurance Monitoring** is not applicable:

See Attachment N. Pre-control PM emissions are expected to be less than 100 tpy for the new lignite storage/use tanks.

2. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

☐ **Permit Shield Requested** *(not applicable to Minor Modifications)*

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

3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision? ☐ Yes ☒ No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

KMC requests that the new lignite storage tank, lignite use tank and their associated fabric filters/stacks be added to the existing Title V Operating Permit.

4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R13-1608M	04/10/2023	
R14-001E	08/14/2023	
G60-C012A	08/21/2012	

5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
	MM/DD/YYYY	
	/ /	

6. Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY
See Attachment N	

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

7. Certification For Use Of Minor Modification Procedures ***(Required Only for Minor Modification Requests)***

Note:	*This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:*

i. Proposed changes do not violate any applicable requirement;

ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;

iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;

v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;

vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed): R.J. Boggs *(Please use blue ink)* Date: 05 / 07 / 2024 *(Please use blue ink)*

Named (typed): **Robert Boggs** Title: **Plant Manager**

Note: Please check if the following included (if applicable):

☐	Compliance Assurance Monitoring Form(s)
☐	Suggested Title V Draft Permit Language

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