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west virginia department of environmental protection

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**MEMORANDUM**

**To:** Beverly McKeone, P.E. – New Source Review Program Manager

**From:** Ed Andrews, Engineer 

**Date:** March 11, 2016

**Subject:** Class II Administrative Update of R13-1652 (R13-1652A) for Mountain State Carbon LLC (009-00002)

On December 15, 2015, the DAQ received a request from Mountain State Carbon LLC to update Permit R13-1652. This request was filed as a Class II Administrative Update under 45 CSR 13. The application published a Class I legal ad in *The Weirton Daily Times* on December 15, 2015, and paid the Class II Filing Fee.

This request is to add a coal tar truck loading station. The existing coal tar loading station was designed to primarily handle rail cars, which is permitted under Permit R13-1652. Both loading stations will utilize the existing load-out pump. Due to this limitation, only one station can be used at a time or at reduced throughput not to exceed 20,000 gallons per hour. The hourly emissions from the new station will be the same as the existing station.

Mountain State Carbon plans on not loading more than 6 million gallons of coal tar per year on a combined total basis, which is a limitation in Permit R13-1652. Thus, this additional loadout station will not increase emissions. Because this change is adding an additional emission point, this change cannot be considered as a Class I Administrative Update and therefore is a Class II in accordance with Rule 13.

Mountain State Carbon has recently had a sample of their crude coal tar analyzed. The resulting analysis indicated that Mountain State Carbon's crude coal tar has a benzene content of 0.025% by weight. Therefore, the handling of this crude coal tar in the loading racks is not considered to be *in benzene service* (40 CFR §61.131). Thus, the components associated with these loading racks would not be subject to the leak detection and repair program requirements of Subpart L to Part 61. The proposed loading rack is not subject to any other applicable rules or regulations.

The writer recommends converting Permit R13-1652 into the current Rule 13 format and incorporating the existing conditions into R13-1652A except for Condition (A)(3). (A)(3)

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required the permittee to implement the leak detection and repair program in accordance with Subparts L and V to Part 61. The components that are in contact with the coal tar are not in benzene service. Thus, Subpart L to Part 61 is not applicable to the tar loading racks.

No additional monitoring is needed since the permit already requires recording the amount of coal tar loaded out on a monthly basis.

These changes to Permit R13-1652A do not affect applicability of the affected source with respect to any applicable rule or regulation. Thus, the writer recommends that Mountain State Carbon LLC be issued Permit R13-1652A as requested in accordance with 45 CSR 13.