



west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Phone: (304) 926-0475 • Fax: (304) 926-0479

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	G40-C078	<i>After-the-Fact</i>
Plant ID No.:	107-00185	
Applicant:	The National Lime and Stone Company (NLS)	
Facility Name:	Williamstown	
Location:	Wood County	
SIC Code:	5032 (Wholesale Trade - Durable Goods)	
NAICS Code:	423320 (Brick, Stone and Related Construction Materials)	
Application Type:	Construction	
Received Date:	February 01, 2016	
Engineer Assigned:	Thornton E. Martin Jr.	
Fee Amount:	\$500	
Date Received:	February 02, 2016	
Complete Date:	March 02, 2016	
Applicant Ad Date:	February 10, 2016	
Newspaper:	<i>The Marietta Times</i>	
UTM's:	Easting: 459.662 km Northing: 4,361.012 km Zone: 17	
Description:	Construction and operation of an aggregate wholesale yard which will consist solely of storage piles, unpaved roadways and loading and unloading of storage piles by front end loader via barge and truck.	

PROCESS DESCRIPTION

The purpose of this facility will be to distribute aggregate material into the construction market which may include but is not limited to, limestone, sand, gravel, recycled asphalt pavement and concrete. NLS will receive the aggregate materials by way of barge, truck or possibly rail in the future. The emission sources at this site will consist of unpaved roadways, storage piles and loading and unloading operations. There will be no specific air pollution control devices utilized at this site.

The facility shall be constructed and operated in accordance with the following equipment and control device information taken from registration application G40-C078:

Equipment ID No.	Date of Manufacture	Description	Maximum Capacity		Control Equipment ¹
			TPH	TPY	
Storage					
OS1 - OS8	2016	348,480 sq.ft. Open Stockpile - receives various aggregate materials from barge and trucks, endloader will transfer the aggregate materials to and from the various stockpiles	---	1,000,000	N

¹ N - No Controls

DESCRIPTION OF FUGITIVE EMISSIONS

The potential sources of fugitive emissions for this facility include emissions from open stockpiles and vehicular traffic on unpaved haulroads and work areas.

The haulroads and work areas will be controlled by monitoring vehicle speed and resurfacing with coarse aggregate as necessary.

The storage piles will be controlled by minimizing drop heights, monitoring excessive drag of endloader bucket and the inherent moisture content of the aggregate materials stored.

SITE INSPECTION

The Williamstown Dock Facility is a leased portion of land from the property owner and is bordered by railroad tracks on one side (parallel to SR14) and the Ohio River on the other side. A single unpaved roadway leads into the facility from SR14. The writer deemed that a site inspection was not necessary at this time due to the type and scope of the construction proposed.

Directions: The site is located on State Highway 14, approximately 1 - 2 miles West of Highland Avenue, Williamstown, WV.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Fugitive emission calculations for continuous and batch drop operations, transfer points, crushing and screening, storage piles, and paved and unpaved haul roads are based on AP-42 "Compilation of Air Pollution Emission Factors." The estimated emission calculations were performed by the applicant and were checked for accuracy and completeness by the writer.

The proposed construction will result in the estimated potential to discharge emissions of approximately 27.44 TPY of PM (particulate matter), of which 8.75 TPY are PM₁₀ (particulate matter less than 10 microns in diameter). Refer to the following table for a complete summary of the proposed facility's emissions:

Table 1: Emissions Summary

<p style="text-align: center;"><i>Emissions Summary - The National Lime and Stone Company G40-C078</i></p>	Controlled PM Emissions		Controlled PM ₁₀ Emissions	
	lb/hr	TPY	lb/hr	TPY
Fugitive Emissions				
Stockpile Emissions	0.44	1.91	0.21	0.90
Unpaved Haulroad Emissions	18.87	24.53	5.58	7.25
Paved Haulroad Emissions	0.00	0.00	0.00	0.00
Fugitive Emissions Total	<i>19.31</i>	<i>26.44</i>	<i>5.79</i>	<i>8.15</i>
Point Source Emissions				
Equipment Emissions	0.00	0.00	0.00	0.00
Transfer Point Emissions	2.00	1.00	1.20	0.60
Point Source Emissions Total	<i>2.00</i>	<i>1.00</i>	<i>1.20</i>	<i>0.60</i>
FACILITY EMISSIONS TOTAL				
	21.31	27.44	6.99	8.75

REGULATORY APPLICABILITY

The proposed construction of an aggregate storage wholesale facility is subject to the following state and federal rules:

45CSR13 Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation

The proposed construction for the aggregate storage wholesale facility is subject to the requirements of 45CSR13, Section 2.24.b., discharges or has the potential to discharge more than six (6) pounds per hour and ten (10) tons per year, or has the potential to discharge more than 144 pounds per calendar day, of any regulated air pollutant; The applicant has submitted the proper application fee of \$500 and published a Class I legal advertisement in *The Marietta Times* on February 10, 2016.

45CSR17 To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter

Per §45-17-3.1 no person shall cause, suffer, allow or permit fugitive particulate matter to be discharged beyond the boundary lines of the property on which the discharge originates or at any public or residential location, which causes or contributes to statutory air pollution.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

A toxicity analysis was not performed because the pollutants being emitted from this facility are primarily PM (particulate matter) and PM₁₀ (particulate matter less than 10 microns in diameter).

AIR QUALITY IMPACT ANALYSIS

Air dispersion modeling was not performed due to the size and proposed location of this facility. This facility will be located in Wood County, WV, which is currently in attainment for PM (particulate matter), PM₁₀ (particulate matter less than 10 microns in diameter) and PM_{2.5} (particulate matter less than 2.5 microns in diameter) with approved maintenance plans.

GENERAL PERMIT ELIGIBILITY

The proposed modification of this facility meets the applicability criteria (Section 2.3), siting criteria (Section 3.1) and limitations and standards (Section 5.1) as specified in General Permit G40-C.

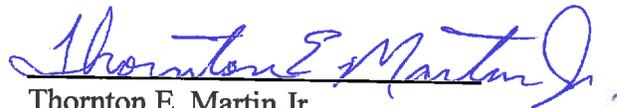
MONITORING OF OPERATIONS

G40-C registrants will be required to perform the following monitoring and recordkeeping:

1. Monitor and record daily and monthly records of the amount of aggregate materials handled (incoming and outgoing).
2. Monitor fugitive emissions, methods, practices and general maintenance in accordance with Section 5.1.5.
3. These records shall be maintained on-site for a minimum of five (5) years from the date of record creation and shall be made available to the Director of the Division of Air Quality or his or her duly authorized representative upon request.

RECOMMENDATION TO DIRECTOR

The information contained in this construction application indicates that compliance with all applicable regulations should be achieved when all proposed particulate matter control methods are in operation. Due to the location, nature of the process, and control methods proposed, adverse impacts on the surrounding area should be minimized. No comments were received. Therefore, the granting of a General Permit to Construct to The National Lime and Stone Company for the operation of their aggregate storage wholesale facility to be located near Williamstown, Wood County, WV is hereby recommended.


Thornton E. Martin Jr.
Permit Engineer

March 02, 2016
Date