



October 15, 2015

Ms. Bev McKeone, Program Manager
NSR Permitting
Division of Air Quality
West Virginia Department of Environmental Protection
601 - 57th Street
Charleston, WV 25304

**Re: Permit Determination Form Application for Proposed Limestone Handling Operations at the Kingsford Manufacturing Company Parsons, WV Plant
Title V Permit No. R30-09300004-2014
Plant ID No. 093-00004**

Dear Ms. McKeone:

Kingsford Manufacturing Company (KMC) owns and operates a charcoal manufacturing facility located in Parsons, West Virginia that is subject to the above referenced Title V Operating Permit. KMC is submitting the attached Permit Determination Form (PDF) to confirm that a construction permit is not required for the proposed alternative receipt of limestone via bulk truck unloading in an existing shed at the Parsons facility. In addition, KMC is requesting an administrative amendment to our Title V permit to identify the new limestone handling operation.

KMC currently receives limestone at the Parsons plant via tank truck and the limestone is pneumatically conveyed to a Bulk Lime Tank designated Source ID E-06-06. KMC is proposing to receive limestone from another supplier that would provide the material in bulk dump trucks equipped with tarps. The limestone will be unloaded onto a storage pile inside an existing shed building and a front-end loader would then transfer the material to a feed hopper and a covered belt conveyor system. This "alternative lime handling" system would handle limestone with a moisture content in the range of 1% - 4%, which results in relatively low fugitive dust emissions. KMC has estimated maximum hourly and annual fugitive dust emissions associated with the truck unloading and front-end loader handling operations using the EPA AP-42 emissions factors for "aggregate material handling and storage piles" (section 13.2.4) and the "worst case" limestone moisture content of 1%. The potential PM and PM10 emission rates are summarized in Attachment E and are significantly lower than the "modification" emissions thresholds of 6 lb/hr and 10 tpy specified in 45CSR13.

KMC requests that an administrative amendment be made to the Title V permit to identify the limestone handling operation as part of Emission Unit 02 – Raw Material Handling. KMC requests that the new limestone operation be identified as Source ID E-02-0E "Limestone Handling" in the Emission Unit table in section 1.1 of the permit.

*Highway 219 S.
PO Box 464
Parsons, WV
26287*

*(304) 478-2911
FAX: (304) 478-2129*

The WVDEP Permit Determination Form and supporting information may be found attached to this letter. If you have any questions or require any additional information, please feel free to contact me at (304) 478-5529.

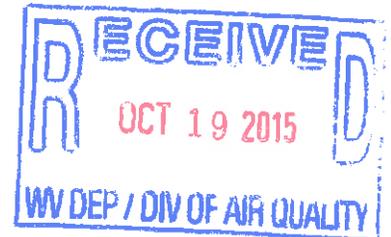
Very truly yours,

KINGSFORD MANUFACTURING COMPANY



Scott Stephenson
Plant Engineering Manager

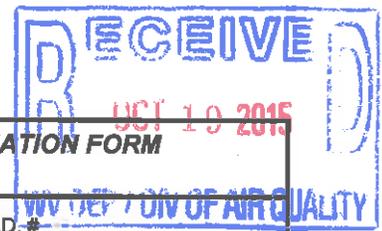
cc: Carey Preston, Mike Young, File





WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street, SE
Charleston, WV 25304
Phone: (304) 928-0475
www.dep.wv.gov/daq

**PERMIT DETERMINATION FORM
(PDF)**



FOR AGENCY USE ONLY: PLANT I.D.# _____
PDF # _____ PERMIT WRITER: _____

1. NAME OF APPLICANT (AS REGISTERED WITH THE WV SECRETARY OF STATE'S OFFICE):

Kingsford Manufacturing Company

2. NAME OF FACILITY (IF DIFFERENT FROM ABOVE):

Parsons, WV Facility

3. NORTH AMERICAN INDUSTRY CLASSIFICATION SYSTEM (NAICS) CODE:

325191

4A. MAILING ADDRESS: P. O. Box 464

4B. PHYSICAL ADDRESS: Route 219

5A. DIRECTIONS TO FACILITY (PLEASE PROVIDE MAP AS ATTACHMENT A): The facility is located about two miles south of Parsons on Route 219.

5B. NEAREST ROAD:
Route 219

5C. NEAREST CITY OR TOWN:
Parsons

5D. COUNTY:
Tucker

5E. UTM NORTHING (KM):
4326.20

5F. UTM EASTING (KM):
613.20

5G. UTM ZONE:
17

6A. INDIVIDUAL TO CONTACT IF MORE INFORMATION IS REQUIRED:
Scott Stephenson

6B. TITLE:
Plant Engineering Manager

6C. TELEPHONE:
304-478-2911

6D. FAX:
304-478-2129

6E. E-MAIL:
scott.stephenson@clorox.com

7A. DAQ PLANT I.D. NO. (FOR AN EXISTING FACILITY ONLY):

093 - 00004

7B. PLEASE LIST ALL CURRENT 45CSR13, 45CSR14, 45CSR19 AND/OR TITLE V (45CSR30) PERMIT NUMBERS ASSOCIATED WITH THIS PROCESS (FOR AN EXISTING FACILITY ONLY):
R30-09300004-2014

7C. IS THIS PDF BEING SUBMITTED AS THE RESULT OF AN ENFORCEMENT ACTION? IF YES, PLEASE LIST:
No

8A. TYPE OF EMISSION SOURCE (CHECK ONE):

- NEW SOURCE** **ADMINISTRATIVE UPDATE**
 MODIFICATION **OTHER (PLEASE EXPLAIN IN 11B)**

8B. IF ADMINISTRATIVE UPDATE, DOES DAQ HAVE THE APPLICANT'S CONSENT TO UPDATE THE EXISTING PERMIT WITH THE INFORMATION CONTAINED HEREIN?

YES **NO**

9. IS DEMOLITION OR PHYSICAL RENOVATION AT AN EXISTING FACILITY INVOLVED? **YES** **NO**

10A. DATE OF ANTICIPATED INSTALLATION OR CHANGE:

10/30/2015

10B. DATE OF ANTICIPATED START-UP:

10/30/2015

11A. PLEASE PROVIDE A DETAILED PROCESS FLOW DIAGRAM SHOWING EACH PROPOSED OR MODIFIED PROCESS EMISSION POINT AS ATTACHMENT B.

11B. PLEASE PROVIDE A DETAILED PROCESS DESCRIPTION AS ATTACHMENT C.

12. PLEASE PROVIDE MATERIAL SAFETY DATA SHEETS (MSDS) FOR ALL MATERIALS PROCESSED, USED OR PRODUCED AS ATTACHMENT D. FOR CHEMICAL PROCESSES, PLEASE PROVIDE A MSDS FOR EACH COMPOUND EMITTED TO AIR.

13A. REGULATED AIR POLLUTANT EMISSIONS:

⇒ **FOR A NEW FACILITY**, PLEASE PROVIDE PLANT WIDE EMISSIONS BASED ON THE POTENTIAL TO EMIT (PTE) FOR THE FOLLOWING AIR POLLUTANTS INCLUDING ALL PROCESSES.

⇒ **FOR AN EXISTING FACILITY**, PLEASE PROVIDE THE PROPOSED CHANGE IN EMISSIONS BASED ON THE PTE OF ALL PROCESS CHANGES FOR THE FOLLOWING AIR POLLUTANTS.

PTE FOR A GIVEN POLLUTANT IS TYPICALLY BEFORE AIR POLLUTION CONTROL DEVICES AND IS COLLECTED BASED ON THE MAXIMUM DESIGN CAPACITY OF PROCESS EQUIPMENT.

POLLUTANT	HOURLY PTE (LB/HR)	YEARLY PTE (TON/YR) (HOURLY PTE MULTIPLIED BY 8760 HR/YR DIVIDED BY 2000 LB/TON)
PM	0.67	0.19
PM ₁₀	0.32	0.09
VOCs		
CO		
NO _x		
SO ₂		
Pb		
HAPs (AGGREGATE AMOUNT)		
TAPs (INDIVIDUALLY)*		
OTHER (INDIVIDUALLY)*		

* ATTACH ADDITIONAL PAGES AS NEEDED

13B. PLEASE PROVIDE ALL SUPPORTING CALCULATIONS AS ATTACHMENT E.

CALCULATE AN HOURLY AND YEARLY PTE OF EACH PROCESS EMISSION POINT (SHOWN IN YOUR DETAILED PROCESS FLOW DIAGRAM) FOR ALL AIR POLLUTANTS LISTED ABOVE INCLUDING INDIVIDUAL HAP'S (LISTED IN SECTION 112[b] OF THE 1990 CAAA), TAP'S (LISTED IN 45CSR27), AND OTHER AIR POLLUTANTS (E.G. POLLUTANTS LISTED IN TABLE 45-13A OF 45CSR13, MINERAL ACIDS PER 45CSR7, ETC.).

14. CERTIFICATION OF DATA

I, CAREY PRESTON (TYPE NAME) ATTEST THAT ALL THE REPRESENTATIONS CONTAINED IN THIS APPLICATION, OR APPENDED HERETO, ARE TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE BASED ON INFORMATION AND BELIEF AFTER REASONABLE INQUIRY, AND THAT I AM A **RESPONSIBLE OFFICIAL**** (PRESIDENT, VICE PRESIDENT, SECRETARY OR TREASURER, GENERAL PARTNER OR SOLE PROPRIETOR) OF THE APPLICANT.

SIGNATURE OF RESPONSIBLE OFFICIAL: _____



TITLE: PLANT MANAGER

DATE: 10 / 15 / 15

** THE DEFINITION OF THE PHRASE 'RESPONSIBLE OFFICIAL' CAN BE FOUND AT 45CSR13, SECTION 2.23.

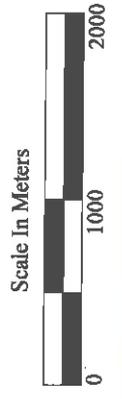
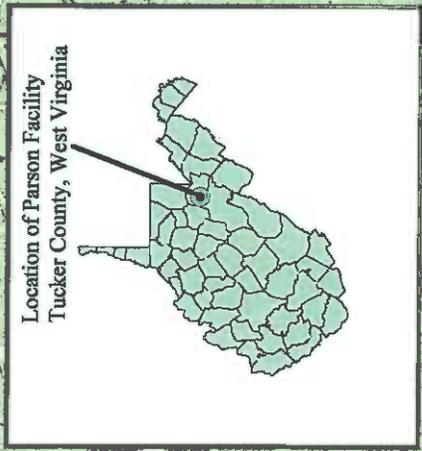
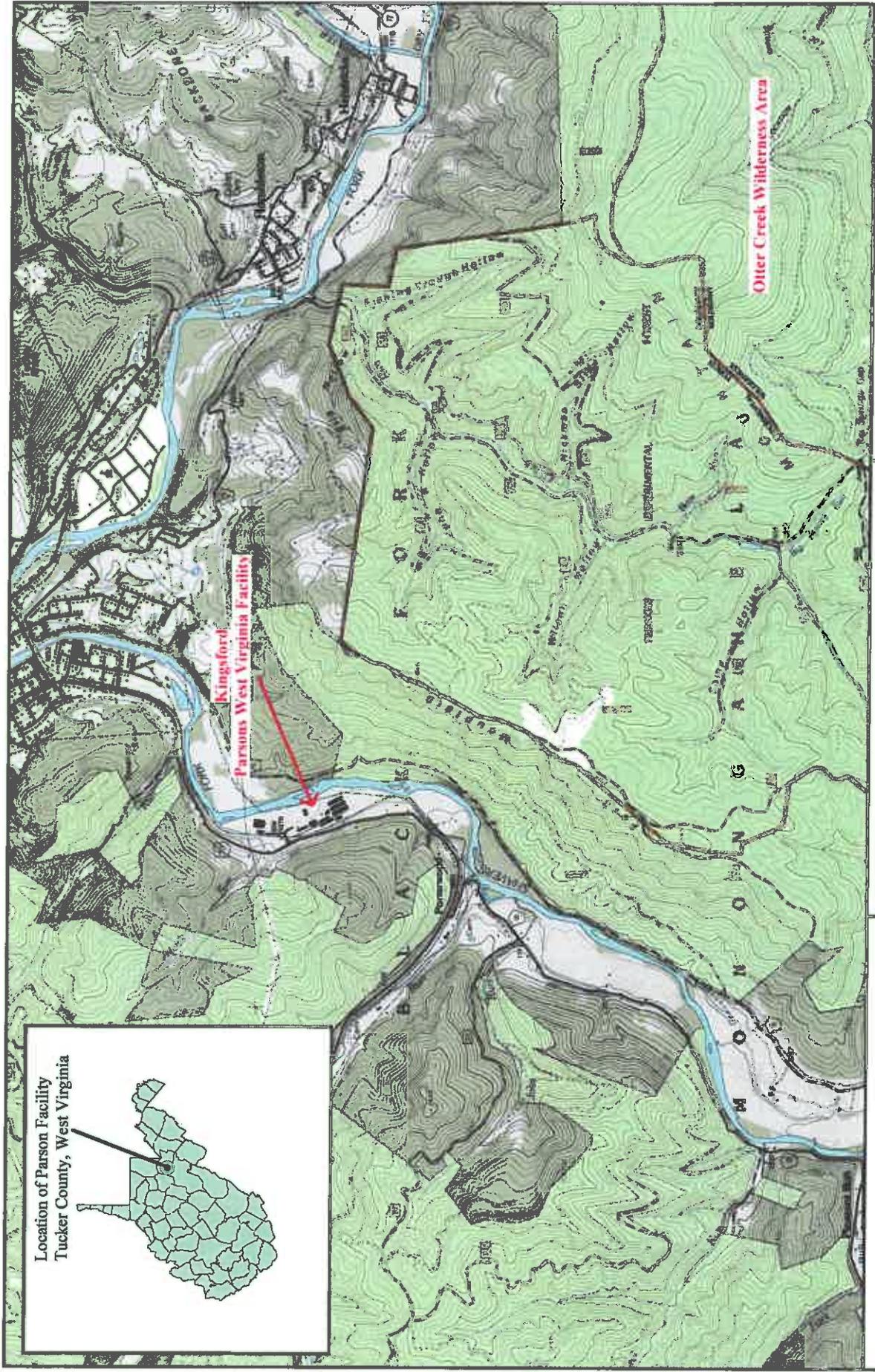
NOTE: PLEASE CHECK ENCLOSED ATTACHMENTS:

ATTACHMENT A ATTACHMENT B ATTACHMENT C ATTACHMENT D ATTACHMENT E

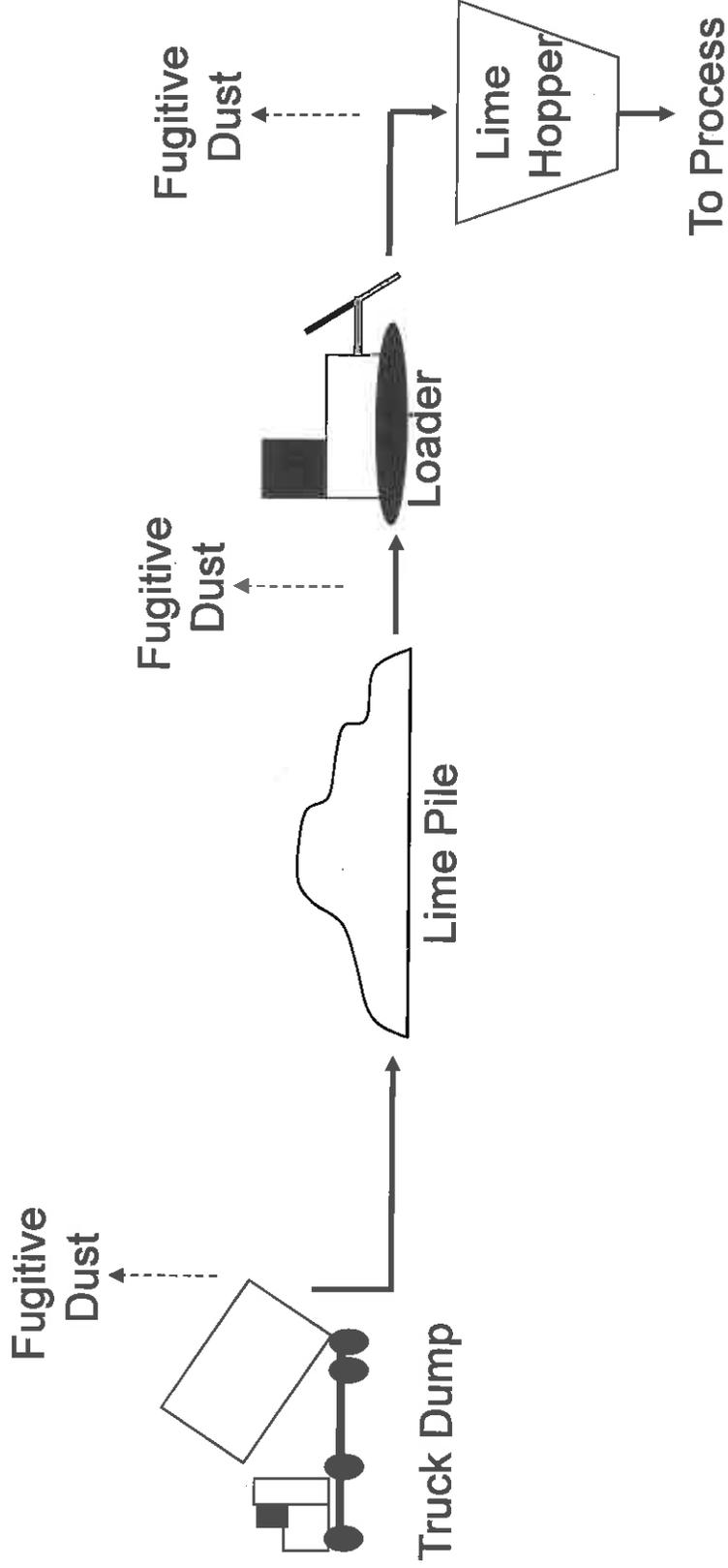
RECORDS ON ALL CHANGES ARE REQUIRED TO BE KEPT AND MAINTAINED ON-SITE FOR TWO (2) YEARS.

THE PERMIT DETERMINATION FORM WITH THE INSTRUCTIONS CAN BE FOUND ON DAQ'S PERMITTING SECTION WEB SITE:

www.dep.wv.gov/daq



Att. A - Site Location
Kingsford Manufacturing Company
Parsons, WV Facility



Attachment B
Process Flow Diagram – Limestone Truck Unloading
Kingsford Mfg. Co. – Parsons, WV

ATTACHMENT C – PROCESS DESCRIPTION

The KMC Parsons, WV manufacturing plant currently receives powdered limestone via tanker trucks that are pneumatically unloaded into storage silos. In the fall of 2015, the Parsons plant plans on also receiving limestone from covered trucks that will back into an existing “shed” (three-sided roofed enclosure), and dump the limestone onto an open pad. The limestone will then be transferred from the resulting pile into a hopper using a front-end loader. The limestone will be transferred via covered conveyor systems to the existing charcoal briquet mixing process operations.

The limestone will be received from a new supplier at a moisture content that ranges between 1%-4%, with 2.5% being typical. The limestone moisture content will minimize the potential for fugitive dust emissions. The lowest moisture content of 1.0% has been used in the fugitive dust emissions calculations.

The limestone handling operations are expected to generate fugitive dust emissions at three material handling “drop points”: (1) from the truck dumping activity, (2) from the loader scooping the material from the pile, and (3) from the loader transferring the material into the hopper. Maximum annual throughput of limestone delivered in this manner is expected to be 15,000 tons per year. Maximum hourly throughput will be 27 tons, the maximum quantity of limestone delivered per truck.

(MSHA); OSHA PEL = permissible exposure limit of the Occupational Safety and Health Administration (OSHA); mg/m³ = milligrams of substance per cubic meter of air.
Limestone (Calcium Carbonate): ACGIH TLV® = 10mg/m³; OSHA PEL = 15mg/m³ (total dust); OSHA PEL = 5mg/m³ (respirable fraction), MSHA PEL = 10mg/m³ (total dust).

Other Particulates: 2001 ACGIH TLV® = 10mg/m³ (inhalable/total particulate, not otherwise specified), 2001 ACGIH TLV® = 3 mg/m³ (respirable particulate, not otherwise specified); OSHA PEL = 15mg/m³ (total particulate, not otherwise regulated), OSHA PEL = 5mg/m³ (respirable particulate, not otherwise regulated).

Respirable Crystalline Silica (SiO₂/quartz): ACGIH TLV® = 0.05mg/m³; MSHA and OSHA PEL = 10mg/m³ ÷ (%SiO₂+2), for respirable dust containing crystalline silica.

Total dust, respirable and nonrespirable: 1973 ACGIH TLV® = 30mg/m³ ÷ (%quartz + 3).

Total Dust: MSHA PEL = 10 mg/m³ (for nuisance particulates listed in Appendix E of the 1973 ACGIH TLV® booklet).

Per ACGIH, adverse effects are not likely to occur in the workplace provided exposure levels do not exceed the appropriate TLVs & PELs. However, because of the wide variation in individual susceptibility, lower exposure limits may be appropriate for some individuals including persons with pre-existing medical conditions such as those described below.

Medical Conditions Aggravated by Exposure: Inhaling respirable dust and/or crystalline silica may aggravate existing respiratory system disease(s) and/or dysfunctions. Exposure to dust may aggravate existing skin and/or eye conditions.

Primary Route(s) of Exposure

Inhalation Skin Ingestion

Acute Toxicity

EYE CONTACT: Direct contact with dust may cause irritation by mechanical abrasion.

SKIN CONTACT: Direct contact may cause irritation by mechanical abrasion.

SKIN ABSORPTION: Not expected to be a significant exposure route.

INGESTION: Expected to be practically non-toxic. Ingestion of large amounts may cause gastrointestinal irritation and blockage.

INHALATION: Dusts may irritate the nose, throat, and respiratory tract by mechanical abrasion. Coughing, sneezing, and shortness of breath may occur following exposures in excess of appropriate exposure limits.

First Aid

EYES: Immediately flush eye(s) with plenty of clean water for at least 15 minutes, while holding the eyelids open. Occasionally lift the eyelids to ensure thorough rinsing. Beyond flushing, do not attempt to remove material from the eye(s). Contact a physician if irritation persists or later develops.

SKIN: Wash with soap and water. Contact a physician if irritation persists or later develops.

INGESTION: If person is conscious, give large quantity of water and induce vomiting; however, never attempt to make an unconscious person drink or vomit. Get immediate medical attention.

INHALATION: Move to fresh air. Dust in throat and nasal passages should clear spontaneously. Contact a physician if irritation persists or later develops.

Steve Sherrard 304-614-3171
For emergencies, contact Tyler Beaty 304-614-2986
(company's designated emergency contact)

Chronic Toxicity

Prolonged and repeated inhalation of respirable crystalline silica-containing dust in excess of appropriate exposure limits has caused silicosis, a lung disease. Not all individuals with silicosis will exhibit symptoms (signs) of the disease. However, silicosis can be progressive, and symptoms can appear at any time, even years

after exposure has ceased. Symptoms of silicosis may include, but are not limited to, the following: shortness of breath; difficulty breathing with or without exertion; coughing; diminished work capacity; diminished chest expansion; reduction of lung volume; right heart enlargement and/or failure. Smoking may increase the risk of developing lung disorders, including emphysema and lung cancer. Persons with silicosis have an increased risk of pulmonary tuberculosis infection.

Respirable dust containing newly broken silica particles has been shown to be more hazardous to animals in laboratory tests than respirable dust containing older silica particles of similar size. Respirable silica particles which had aged for sixty days or more showed less lung injury in animals than equal exposures of respirable dust containing newly broken particles of silica.

There are reports in the literature suggesting that excessive crystalline silica exposure may be associated with adverse health effects involving the kidney, scleroderma (thickening of the skin caused by swelling and thickening of fibrous tissue) and other autoimmune disorders. However, this evidence has been obtained primarily from case reports involving individuals working in high exposure situations or those who have already developed silicosis; and therefore, this evidence does not conclusively prove a causal relationship between silica or silicosis and these adverse health effects. Several studies of persons with silicosis also indicate an increased risk of developing lung cancer, a risk that increases with the duration of exposure. Some of these studies of silicotics do not account for lung cancer confounders, especially smoking.

Limestone is not listed as a carcinogen by the International Agency for Research on Cancer (IARC), the National Toxicology Program (NTP), or the Occupational Safety and Health Administration (OSHA). In October 1996, an IARC Working Group re-assessing crystalline silica, a component of this product, designated respirable crystalline silica as carcinogenic (Group 1). The NTP's Report on Carcinogens, 9th edition, lists respirable crystalline silica as a "known human carcinogen." In year 2000, the American Conference of Governmental Industrial Hygienists (ACGIH) listed respirable crystalline silica (quartz) as a suspected human carcinogen (A-2). These classifications are based on sufficient evidence of carcinogenicity in certain experimental animals and on selected epidemiological studies of workers exposed to crystalline silica.

California Proposition 65: WARNING: This product contains chemical(s) known to the state of California to cause cancer.

7. PERSONAL PROTECTION AND CONTROLS

Respiratory Protection

For respirable quartz levels that exceed or are likely to exceed an 8-hr TWA of $0.1\text{mg}/\text{m}^3$, a NIOSH approved dust respirator is recommended. For respirable quartz levels that exceed or are likely to exceed an 8-hr TWA of $0.5\text{mg}/\text{m}^3$, a NIOSH approved HEPA filter respirator is recommended. If respirable quartz levels exceed or are likely to exceed an 8-hr TWA of $5\text{mg}/\text{m}^3$, a NIOSH approved positive pressure, full face respirator or equivalent is recommended. Respirator use must comply with applicable MSHA or OSHA standards, which include provisions for a user training program, respirator repair and cleaning, respirator fit testing, and other requirements.

Ventilation: Local exhaust or general ventilation adequate to maintain exposures below appropriate exposure limits.

Skin Protection

See "Hygiene" section below.

Eye Protection

Safety glasses with side shields should be worn as minimum protection. Dust goggles should be worn when excessively (visible) dusty conditions are present or are anticipated.

Hygiene

Wash dust-exposed skin with soap and water before eating, drinking, smoking, and using toilet facilities. Wash work clothes after each use.

Other Control Measures

Respirable dust and quartz levels should be monitored regularly. Dust and quartz levels in excess of appropriate exposure limits should be reduced by all feasible engineering controls, including (but not limited to) wet suppression, ventilation, process enclosure, and enclosed employee work stations.

8. STORAGE AND HANDLING PRECAUTIONS

Respirable crystalline silica-containing dust may be generated during processing, handling, and storage. The personal protection and controls identified in Section 7 of the MSDS should be used as appropriate. Do not store near food and beverages or smoking material.

9. SPILL, LEAK AND DISPOSAL PRACTICES**STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED**

The personal protection and controls identified in Section 7 of the MSDS should be used as appropriate. Spilled material, where dust can be generated, may overexpose cleanup personnel to respirable crystalline silica-containing dust. Wetting of spilled material and/or use of respiratory protective equipment may be necessary. Do not dry sweep spilled material. Prevent spilled materials from inadvertently entering streams, drains, or sewers.

Steve Sherrard 304-614-3171
For emergencies, contact Tyler Beaty 304-614-2986
(your company's designated emergency contact)

WASTE DISPOSAL METHOD

Pick up and reuse clean materials. Dispose of waste materials only in accordance with applicable federal, state, and local laws and regulations.

10. TRANSPORTATION

DOT Hazard Classification: None

Placard Required: None

Label Required: Label as required by the OSHA Hazard Communication Standard [29 CFR 1910.1200 (f) and applicable state and local laws and regulations.

For Further Information Contact: Place here the name, address, and telephone number of the operator or responsible party who can provide more info about the hazardous chemical.

Date of Preparation:

Emergency Information: Your company's designated emergency contact.

Notice: JF Allen Company believes the information contained herein is accurate; however, JF Allen Company makes no guarantees with respect to such accuracy and assumes no liability in connection with the use of the information contained herein by any party. The provision of the information contained herein is not intended to be and should not be construed as legal advice or as ensuring compliance with any federal, state or local laws and regulations. Any party using this product should review all such laws, rules or regulations prior to use.

NO WARRANTY IS MADE, EXPRESS OR IMPLIED, OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE.

ATTACHMENT E
Potential Emissions
Proposed Limestone Unloading and Handling
Kingsford Manufacturing Company
Parsons, WV

Activity	Limestone Throughputs		# Drop Points	Emission Factors ¹			Emissions					
	tons/hr	tons/yr		PM	PM ₁₀	PM _{2.5}	PM		PM ₁₀		PM _{2.5}	
				lb/ton	lb/ton	lb/ton	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
Truck Unloading	27	15,000	1	0.008	0.004	0.001	0.22	0.06	0.11	0.03	0.02	0.00
Transfer to Hopper	27	15,000	2	0.008	0.004	0.001	0.45	0.12	0.21	0.06	0.03	0.01
Totals						0.67	0.19	0.32	0.09	0.05	0.01	

¹ From US EPA AP-42 Chapter 13.2.4 "Aggregate Handling and Storage Piles" (1/106) using the equation $E = k \cdot 0.0032 \cdot [(U/5)^{1.3} / (M/2)^{1.4}]$ where E is the emission factor in lb/ton, k is the particle size multiplier, U is the mean wind speed in mph, and M is the material moisture content in %. Wind speed used in the calculations is 6.2mph (average annual wind speed for Parson, WV), and Moisture content used was 1% (lower range of moisture content of delivered limestone per supplier). Particle size multipliers are 0.74 for PM, 0.35 for PM₁₀, and 0.053 for PM_{2.5}.