



west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345
Phone: 304 926 0475 • Fax: 304 926 0479

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

MEMORANDUM

To: Beverly McKeone
From: Jonathan Carney
Date: September 12, 2016
Subject: Rhodes Brick & Block Company – St. Albans Concrete – Kanawha County, WV
ID #: 039-00110
APP #: PD16-051

BACKGROUND INFORMATION:

Rhodes Brick & Block Company is proposing to replace an existing cement storage bin and baghouse. The existing storage bin, 56 ton – max capacity, is equipped with a “Dusty Dustless” Model 16D shaker type baghouse that has a control efficiency rating of 99.96%. The proposed replacement cement storage bin is smaller (37.5 ton – max capacity) and is equipped with a Belgrade Steel Tank Company 330 square foot Pulse Jet Baghouse with a control efficiency rating of 99.98%. 25 tons per hour, one hour per day, and 9,100 tons per year as the maximum design throughput were used to calculate the PM and PM₁₀ potentials to emit submitted with the PDF. The potential emissions provided in the PDF are as follows:

	Uncontrolled		Controlled	
	Lbs/hr	Tons Per Year	Lbs/hr	Tons/Year
PM	18.25	3.32	0.0036	0.00066
PM ₁₀	11.75	2.14	0.0023	0.00043

The facility has a one page permit that does not limit the facility to 25 tons per hour and 9,100 tons per year.

RECOMMENDATION:

It should be noted that this is not a “like kind” or rather a like-for-like replacement. The equipment being replaced it not the same make, model, type, size, or capacity.

Based off of the worst case input being 25 tons cement per hour as shown in the PDF, the potential-to-emit of the new silo is estimated as follows:

	Uncontrolled		Controlled	
	Lbs/hr	Tons Per Year	Lbs/hr	Tons/Year
PM	18.25	79.94	0.00	0.02
PM ₁₀	11.75	51.47	0.00	0.01

The uncontrolled emission increases for PM and PM₁₀ exceed six (6) lbs/hour and ten (10) TPY of any regulated pollutant.

Since a one page permit cannot be administratively updated, the source will need to apply for a permit modification.



 Jonathan Carney, P.E.
 Engineer

September 12, 2016
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