

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on December 23, 2008

Permit Number: **R30-09300004-2008**
Application Received: **October 13, 2009**
Plant Identification Number: **03-54-09300004**
Permittee: : **Kingsford Manufacturing Company**
Facility Name: **Parsons**
Mailing Address: **P.O. Box 464, Parsons, WV 26287**

Permit Action Number: *SM01* Revised: *January 25, 2010*

Physical Location: Parsons, Tucker County, West Virginia
UTM Coordinates: 613.2 km Easting • 4326.2 km Northing • Zone 17
Directions: The Facility is located on Route 219, about 2 miles South of Parsons

Facility Description

The Kingsford Manufacturing Company Parsons Plant is a charcoal manufacturing facility. It manufactures charcoal briquets from raw materials including wood/sawdust, char produced on-site and received from the Beryl plant, coal, limestone, sodium nitrate, starch, borax, and solvent for briquets.

Facility SIC Code: 2861 Chemicals and allied products - gum and wood chemicals.

The proposed modification incorporates requirements of 45CSR13 Class II General Permit G60-C and General Permit Registration G60-C012 for Diesel Fire Pump FP-2 installed in September of 2008. This Permit modification application is after-the-fact because the pump was installed more than 12 months ago.

The diesel fire pump was installed at a new fire protection pond at the Parsons plant. The 420 hp pump is equipped with a John Deere model year 2008 fire pump engine that meets the air emission limitations specified in 40 CFR Part 60 Subpart IIII. The pump is equipped with a 550 gallon diesel storage tank. The diesel fuel used in the engine will be limited to low sulfur diesel with a sulfur content of 500 ppm. The tank

is insignificant source of emissions, therefore it wasn't assigned any emission point. The engine is equipped with a non-resettable hour meter and hours of operation will be logged. In the absence of a fire, Kingsford anticipates that normal operation of the pump will consist of weekly 30 minute exercise periods, for a total of approximately 26 hours of operation per year.

Emissions Summary

As the result of this modification the total emissions from the facility will increase:

Regulated Pollutants	PTE change, TPY
NO _x	1.54
CO	0.11
VOC	0.02
Total PM / PM ₁₀ /PM _{2.5}	0.01
SO ₂	0.04
Total HAPs	0.00231

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains potential to emit over 100 tons per year of PM₁₀ and NO_x. Due to this facility's potential to emit over 100 tons per year of one or more criteria pollutants, Kingsford Manufacturing Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Pre-construction permits for sources
	45CSR30	Operating permit requirement
	40 C.F.R. Part 60	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (Subpart IIII)
State Only:	N/A	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
G60-C012	August 11, 2009	n/a

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

1. Attachment 2 to the Permit was added to include 45CSR13 Class II General Permit G60-C.
2. Section 11 was added to the Permit to cover requirements of General Permit Registration G60-C012.
3. Since this is an "after the fact" application, the permittee does not receive an Application Shield.
4. Requirements 3.5.3. and 3.5.5. (boilerplate) were revised to reflect EPA Region 3's request that all annual compliance certifications be submitted electronically (by e-mail).

Non-Applicability Determinations

40 C.F.R. Part 64 CAM rule is not applicable to the Diesel Fire Pump FP-2 because its PTE for any regulated pollutant is lower than 100 TPY.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: December 2, 2009
Ending Date: January 4, 2010

All written comments should be addressed to the following individual and office:

Natalya Chertkovsky-Veselova
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Natalya Chertkovsky-Veselova
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

During the comment period a typo was noticed on page 8 of the permit – capacity of dust collector S-07 was mistakenly indicated as 560 CFM instead of 30,000 CFM. The typo was corrected.