

Fact Sheet



*For Draft/Proposed 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 May 18, 2009.

Permit Number: **R30-00300002-2009**
Application Received: **December 28, 2009**
Plant Identification Number: **003-00002**
Permittee: **Continental Brick Company**
Facility Name: **Martinsburg Facility**
Mailing Address: **154 Charles Town Road, Martinsburg, WV 25405**

Permit Action Number: *SM01* Revised: *Draft*

Physical Location: Martinsburg, Berkeley County, West Virginia
UTM Coordinates: 245.4 km Easting • 4,368.7 km Northing • Zone 18
Directions: From Interstate 81 take Exit 12, travel east on State Route 9
 approximately 1.5 miles. The facility is on the right side of State Rte. 9.

Facility Description

The Martinsburg Facility is a face brick manufacturing operation which includes quarry to final brick production and storage. It operates under SIC Code 3251. The weathered Martinsburg Shale is quarried by the use of pans, crushed, screened, wetted, mixed in a pug mill, vacuum extruded, trimmed and cut to form the final shape of the green face bricks. Green face bricks then pass through the warming room, drying room, and kiln to remove the moisture in a controlled manner. Fired bricks are sorted and packaged for sale. Bricks not meeting the specifications (waste bricks) are disposed on property.

Emissions Summary

Modification of a face brick manufacturing operation to add a periodic kiln and increase SO₂ and HF emission limits from the tunnel kilns.

The facility is adding a third kiln to its existing operations. This periodic kiln will increase emissions slightly to the facility (see Condition 4.1.1). Additionally, the emissions for the existing kilns (K1E and K2E) have been recalculated. The PTE of the facility calculated for the previous permit was 86.74 TPY for SO₂ and 26.74 TPY for HF. These values have been recalculated due to testing of the material (shale) used to make the bricks. These values are now 122.18 TPY for SO₂ and 130.87 TPY for HF, which also include an increase of 0.02 TPY for SO₂ and 0.07 TPY resulting from the third kiln.

Production of Kilns 1 and 2 are limited by Conditions 4.1.12 and 4.1.13 to 8.25 tons per hour each. Production from the Periodic Kiln is limited by Condition 4.1.14 to 2 tons per 72 hour cycle. However, only 48 hours of the cycle is for “firing”, the other 24 are for cooling. This rate comes out to 0.042 tons per hour. The resulting particulate matter limit from 45CSR§7- 4.1 for a Source Operation Type “a” is 13.9 lbs/hr for Kiln 1 and 2 each, and 0.10 lbs/hr for the Periodic Kiln. The particulate matter emissions given in R13-0682A Permit are 9.5 lbs/hr for Kiln 1 and 2, and 0.10 lbs/hr for the Periodic Kiln. Therefore compliance with the R13-0682A limits will also show compliance with the Rule 7 limits.

NO_x, CO, VOC, HCl, and Non HF/HCL HAP emissions are based on AP42 factors that assume an emission rate for these pollutants based upon the type of industry and production rate. Since these emissions are an assumption from production, then by limiting the production of the kilns, emissions will be at or less than those given in Condition 4.1.10. Conditions 4.1.12-14 limit the production rate for the kilns, and Conditions 4.4.3 and 4.4.4 requires the permittee to maintain operating schedules and fuel usage of each of the kilns, and also monthly records of the production rates.

SO₂ emission rates are based upon the percent sulfur of the coal used to fire the kilns. Condition 4.1.15 requires the permittee to use coal that is not more than 1% sulfur, and Condition 4.3.4 requires the permittee to verify with the fuel supplier that the coal does not exceed this percentage of sulfur.

HF emissions are based upon the fluoride concentration of the shale used to manufacture the bricks. Condition 4.3.3 requires the permittee to measure the fluoride concentration before and after firing of the brick at least once per 12,000 tons of production. Condition 4.1.16 also gives a HF emission per mass of production. Compliance is also by measuring the amount of fluoride concentration before and after firing of the brick.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:
N/A

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: July 28, 2010
Ending Date: August 27, 2010

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

Mike Egnor
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

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.