

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 March 16, 2009.

Permit Number: **R30-05100011-2009**
Application Received: **January 10, 2012**
Plant Identification Number: **03-54-051-00011**
Permittee: **Rain CII Carbon LLC**
Facility Name: **Moundsville Calcining Plant**
Mailing Address: **3 Energy Road Moundsville, WV 26041**

Permit Action Number: *SM01* Revised: *May 15, 2012*

Physical Location: Moundsville, Marshall County, West Virginia
UTM Coordinates: 515.30 km Easting • 4409.20 km Northing • Zone 17
Directions: Drive south on Rt. 2 from Moundsville, the plant is about 10 miles south and is on the right (Ohio River side of route 2), between the AEP Kammer and Mitchell power plants.

Facility Description

This onshore calcining plant calcines raw (green) coke. Raw coke can be petroleum coke of various forms, which is a solid byproduct of the refining of petroleum, or any other carbonaceous material that can be calcined. The plant is mainly a solids handling facility with the following Facility SIC Codes:
2895 - Chemicals and Allied Products - Carbon Black
2999 - Petroleum Refining and Related Industries - Petroleum and Coal Products
3229 - Stone, Clay, Glass, and Concrete Products - Pressed and Blown Glass, NEC

This modification revises the 45CSR10 Monitoring Plan by incorporating the use of a Continuous Emission Monitoring System (CEMS) to monitor SO₂ emissions. This modification also removes the Greenhouse gas reporting requirement, and revises the U.S. EPA mailing address.

Emissions Summary

Since this modification involves existing equipment, no emission changes are associated with this modification.

Title V Program Applicability Basis

This facility maintains the potential to emit over 100 tons per year of Carbon Monoxide, Nitrogen Oxides, PM₁₀, and Sulfur Dioxide; and over 10 tons per year of Nickel compounds. Due to this facility's potential to emit over 100 tons per year of criteria pollutants and over 10 tons per year of a single HAP, Rain CII Carbon LLC 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:	45CSR10	SO ₂ emissions monitoring
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the 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>)
None	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

Changes Made with This Modification

The following changes were made with this permit modification:

- In Condition 3.5.3., the address for U.S EPA was updated.
- Conditions 3.1.10 and 3.5.10 were removed because the State Rule for Greenhouse Gases, 45CSR42 is in the process of being repealed.
- Condition 4.2.2. was amended with the new date of submission of the 45CSR10 Monitoring Plan.
- Appendix A, the SO₂ Monitoring Plan, was amended to incorporate CEMS to monitor SO₂ emissions.

40 CFR 63, Subpart ZZZZ RICE MACT Applicability

In the previous modification, Rain CII requested that only placeholder language for the RICE MACT be added. Rain CII will request a modification to this Title V permit in early 2013 to add the detailed RICE MACT compliance requirements for their emergency engines at that time.

Non-Applicability Determinations

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

Greenhouse Gas Permitting - This modification does not trigger a PSD permit, therefore, there are no applicable GHG requirements.

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: March 28, 2012

Ending Date: April 27, 2012

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

Bobbie Scroggie
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

Bobbie Scroggie
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Division of Air Quality
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Charleston, WV 25304
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