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NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

June 25, 2020

Brian Brockway
Plant Manager
The Kingsford Products Co
21200 Maries Road 314
Belle, MO 65013

RE: Part 70 Operating Permit Minor Modification - Permit Number: OP2017-088A
Project Number: 2019-05-019; Installation Number: 125-0001

Dear Brian Brockway:

Your Part 70 Operating Permit OP2017-088 is being modified in response to your May 9, 2019 request. Your request was for the operating permit's equipment lists to reflect the additional equipment approved by construction permit 112017-008.

Your permit is revised by replacing the equipment lists for Permit Condition 1 on page 15, Permit Condition 2 on page 22, Permit Condition 3 on page 25, and the Statement of Basis explanation for 40 CFR Part 60, Subpart Kb on page SB-11. In order to ensure that your operating permit reflects the current processes at your installation, please replace all of the mentioned pages with the attached pages below.

This permit modification may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.



Brian Brockway
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If you have any questions regarding this modification, please do not hesitate to contact Michael Stansfield at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

A handwritten signature in blue ink that reads "Kendall B. Hale". The signature is written in a cursive style with a large initial 'K'.

Kendall B. Hale
Permits Section Chief

KBH:bjj

Enclosures

c: Southeast Regional Office
PAMS File: 2019-05-019



PART 70

PERMIT TO OPERATE

MINOR MODIFICATION

Operating Permit Number: OP2017-088A
Installation Name: The Kingsford Products Co
Installation ID: 125-0001
Project Number: 2019-05-019

Description of Part 70 Minor Modification:

This installation manufactures and packages Kingsford® brand charcoal briquets in several bag sizes. The plant receives wood, which is processed in a wood dryer and retort furnace to produce char. The char is mixed with other additives including a starch binder and pressed into briquets. The briquets are then dried in three briquet dryers, cooled, and then stored in silos prior to bagging and packaging. The plant also has a solvent treated briquet operation to produce MatchLight® brand products. The Belle plant is classified as an existing major source for construction permitting, and is a Named Installation (#25 Charcoal Production Facilities). The installation is classified under SIC 2861 and NAICS 325194.

The Kingsford Products Co submitted a request dated March 9 2019, to update the operating permit to reflect the additional equipment approved by construction permit 112017-008.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

Equipment subject to Permit Condition 1		
Description	Control Device	EIQ #
Single Pass Sawdust Dryer, installed 1993. ¹	Two high efficiency cyclones that vent to the After Combustion Chamber (ACC). The ACC has two low NO _x fuel oil burners and one low NO _x propane burner (for startup). The two oil burners are rated at 56.5 MMBtu/hr each and the propane burner is rated at 41 MMBtu/hr. The oil burners may also fire propane. ACC installed 1993. (EP-04)	EP-04
Multi-hearth Retort Furnace, 5 Hearths, burners rated 1.48 MMBtu/hr total, combusts fuel oil. Installed 1993. ¹	Four high efficiency cyclones that vent to the After Combustion Chamber (ACC). The ACC has two Low NO _x fuel oil burners and one low NO _x propane burner (for startup). The two oil burners are rated at 56.5 MMBtu/hr each and the propane burner is rated at 41 MMBtu/hr. The oil burners may also fire propane. ACC installed 1993. (EP-04) Six Low NO _x fuel oil burner (used for startups only)	EP-04
Briquet Dryers #1, #2 and #3, connected in parallel, with a single briquet dryer furnace, rated 30 MMBtu/hr, combusts fuel oil #2. Installed 1993. ¹	Low NO _x fuel oil burner	EP-23
Boiler fueled by fuel oil #2 and waste heat, MHDR 16.8 MMBtu/hr, installed 1993.	Low NO _x fuel oil burner	EP-19

¹Production maximum hourly design rates are not included in this table as they may change with the emissions testing which is required every five years.

Permit Condition 1

Equipment subject to Permit Condition 2		
Description	Control Device	EIQ #
Single Pass Sawdust Dryer, installed 1993. ¹	Two high efficiency cyclones that vent to the After Combustion Chamber (ACC). The ACC has two low NO _x fuel oil burners and one low NO _x propane burner (for startup). The two oil burners are rated at 56.5 MMBtu/hr each and the propane burner is rated at 41 MMBtu/hr. The oil burners may also fire propane. ACC installed 1993. (EP-04)	EP-04
Multi-hearth Retort Furnace, 5 Hearths with six Low NO _x fuel oil burners (used for startups only) total rating is 1.48 MMBtu/hr. Installed 1993. ¹	Four high efficiency cyclones that vent to the After Combustion Chamber (ACC). The ACC has two low NO _x fuel oil burners and one low NO _x propane burner (for startup). The two oil burners are rated at 56.5 MMBtu/hr each and the propane burner is rated at 41 MMBtu/hr. The oil burners may also fire propane. ACC installed 1993. (EP-04)	EP-04
Briquet Dryers #1, #2 and #3, connected in parallel, with a single briquet dryer furnace, rated 30 MMBtu/hr, combusts fuel oil #2. Installed 1993. ¹	Low NO _x fuel oil burner	EP-23

¹Production maximum hourly design rates are not included in this table as they may change with the emissions testing which is required every five years.

<p>Permit Condition 2</p> <p>December 26, 2000 Consent Agreement; and</p> <p>September 24, 2002 Termination Agreement</p> <p>Planned Retort Downtimes (PRD)</p>
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Termination Agreement:

1. Upon the execution of the Termination Agreement, the Settlement Agreement is terminated. Sections 19 and 30 of the Settlement Agreement survive termination. If there are inconsistencies between the Settlement Agreement and the Termination Agreement, the Termination Agreement controls. (Termination Agreement #20)
 - a. Pyrolysis, as the term is used in issued permits, is not occurring during PRD activities, and the permittee is therefore not required to meet the 1600°F ACC permit limit, or the CO limit in the issued permits, during PRD. (Settlement Agreement #19)

Equipment subject to Permit Condition 3		
Description	Control Device	EIQ #
Matchlight pretreat curtain coater (ACC and ACC bypass)	After Combustion Chamber (ACC). The ACC has two low NO _x fuel oil burners and one low NO _x propane burner (for startup). The two oil burners are rated at 56.5 MMBtu/hr each and the propane burner is rated at 41 MMBtu/hr. The oil burners may also fire propane. ACC installed 1993. (EP-04)	26 (ACC bypass)

<p>Permit Condition 3</p> <p>10 CSR 10-6.060 Construction Permits Required</p> <p>Construction Permit No. 0699-003</p>

Emission Limitation:

The permittee shall emit into the atmosphere from the solvent treated briquet (STB) system (EP-26) less than 85 tons of volatile organic compounds (VOCs) in any consecutive 12-month period. [Special Condition #1]

Recordkeeping

1. Records of monthly and consecutive 12-month total VOC emissions from the STB system shall be kept on-site for the most recent 60 months. Attachment F, or an equivalent, shall be used for this purpose.[Special Condition #4]
2. The permittee shall maintain an operating and maintenance log for the ACC which shall include the following. Attachment G, or an equivalent, shall be used for this purpose.
 - a. Incidents of malfunction, with impact on emissions, duration of event, probably cause, and corrective actions; and
 - b. Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Equipment subject to Permit Condition 4		
Description	Control Device	EIQ #
2 Lignite storage silos	Individual bin vents and individual fabric filters (CD-4 and 5)	EP-09

	Propane Tank	1,000
	Propane Tank	15,000
	Used motor oil tank	
	Kerosene tank	200

The following storage tanks are not subject to the requirements of Subparts K or Ka because the contents do not meet the definition of petroleum liquid. Additionally, these tanks are not subject to Subpart Kb. That subpart does not apply to storage vessels with a capacity between 75 m³ and 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa, see §60.110b(b). The maximum true vapor pressure of the materials being stored is less than 15.0 kPa.

EP #	Description	¹ Capacity (m ³)	Solvent Vapor Pressure (kPa)
EP-18	Diesel Fuel Storage Tank	113.59	0.06
EP-25	Three Matchlight™ Pretreat (Briquet Solvent) Tanks	113.59	0.40

¹These tank capacities are approximately 30,000 gallons.

40 CFR part 60, Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

This subpart applies to various stationary compression ignition internal combustion engines, as detailed in §60.4200.

This regulation applies to the Retort Emergency Power Generator (EP-45) and the Fire Pump Engine #3 (EP TBD). These units are compression ignition engines operated as emergency engines in accordance with the provisions of the regulation. The Retort Emergency Power Generator (EP-45) was constructed 2012, with a MHDR of 11.7 gal/hr. The Fire Pump Engine #3 (EP TBD) was constructed 2014, with a MHDR of 12.8 gal/hr. Both units combust #2 fuel oil and are subject to the same requirements of this regulation due to their size, installation date, and emergency engine status.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

This regulation applies to vapor and cold cleaning machines that uses any solvent containing methylene chloride (CAS #75-09-2), perchloroethylene (CAS #127-18-4), trichloroethylene (CAS #79-01-6), 1,1,1-trichloroethane (CAS #71-55-6), carbon tetrachloride (CAS #56-23-5) or chloroform (CAS #67-66-3), or any combination of these solvents, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent. This regulation applies to area and major sources of HAP emissions.