



Synthetic Minor / Title V Permit Renewal Application

**U.S. Smokeless Tobacco Company
Eagle One Facility
Hopkinsville, KY**

May 2025

Application Prepared by:

**Altria Client Services LLC
2325 Bells Road
Richmond, Virginia 23234**

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Introduction

The U.S. Smokeless Tobacco Company (USSTC) is requesting a renewal to the Title V permit (V-14-014 R2) issued December 6, 2020, for the Eagle One Facility. The facility is located at 100 Weyman's Way, Hopkinsville, KY 42240, which is within the southern city limits of Hopkinsville.

The permitted facility includes a Dry Flour Plant, a Tobacco Curing Operation, Tobacco Finishing, and various support facilities/operations. This application adds a second finishing mixer in emission unit 14. The plant receives tobacco stems and leaf and produces dried tobacco and cured tobacco. Cured tobacco is finished and shipped to other USSTC facilities to be packaged into smokeless tobacco products. In addition, the Eagle One Facility can transfer and process tobacco intermediates to and from other USSTC facilities as contingencies.

The facility is requesting that the renewal permit also allow for the installation of a second finishing mixer in Emissions Unit 14. No increase in throughput or emissions is requested. The new mixer will simply allow for higher product integrity.

We have prepared a complete Title V application that reflects all existing emission units. A site location map is provided in **Figure 1**. An overview of the site's existing processes and emission units is provided in **Figure 2**. A summary of the site-wide uncontrolled and unlimited Potential to Emit (PTE) is provided in **Table 1** and a revised summary of the site's controlled and limited PTE is provided in **Table 2**.



Flavoring Solution (VOC)

Curing Solution (non-VOC)

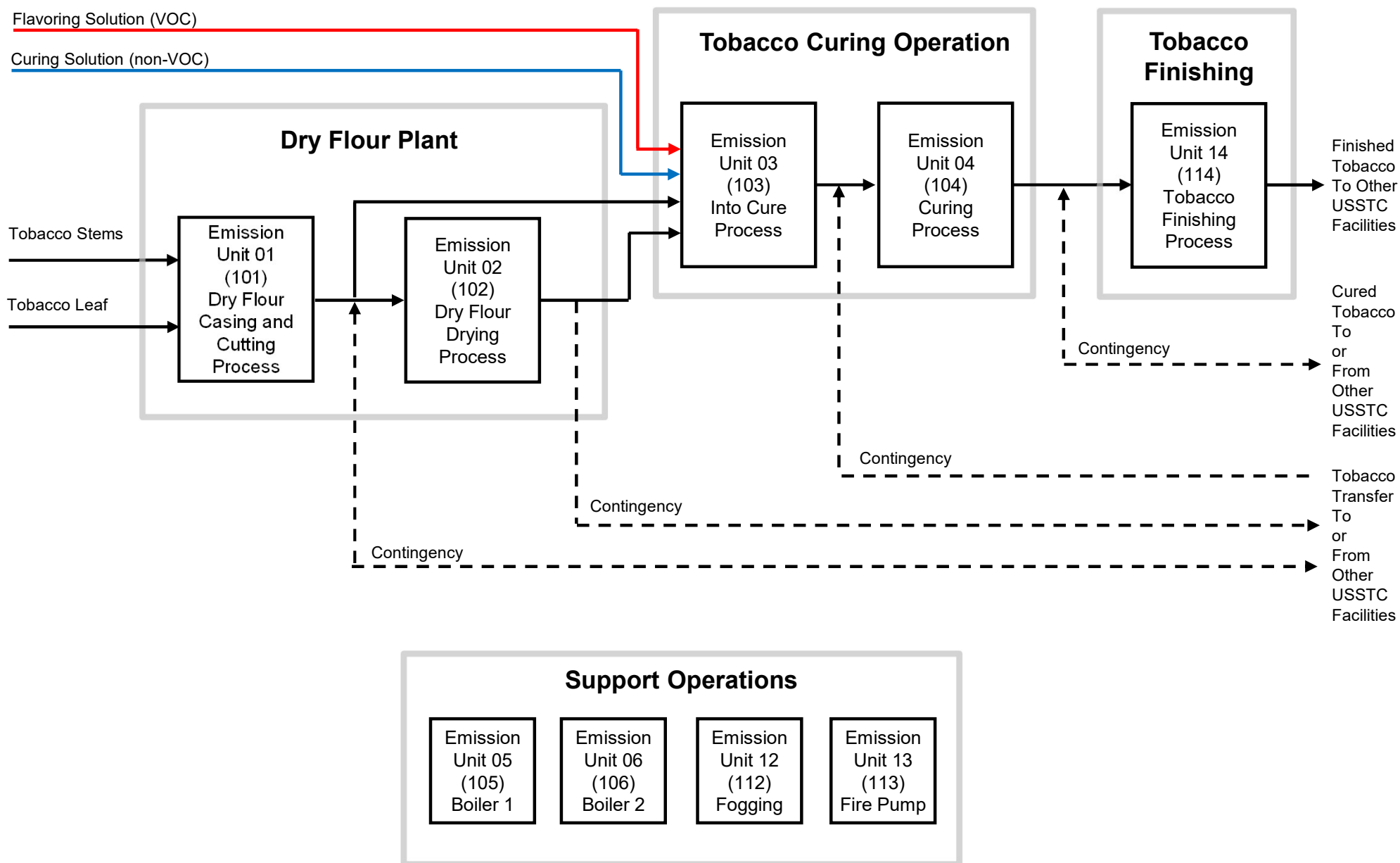


Table 1
U.S. Smokeless Tobacco Co. - Eagle One Facility
Site-wide Uncontrolled and Unlimited Potential to Emit (PTE) Summary

May 2025

Emission Unit		Uncontrolled and Unlimited PTE (tons/yr)							
		PM / PM ₁₀	SO ₂	NO _x	CO	VOC	GHG	HAPs	NH3
Dry Flour Plant	Emission Unit 01 (101) Dry Flour Casing Process	227.13	--	--	--	18.99	--	--	
	Emission Unit 02 (102) Dry Flour Drying Process	201.44	0.01	2.80	1.66	61.72	2,743	--	14.24
Tobacco Curing Operation	Emission Unit 03 (103) Into Cure Process	--	--	--	--	227.43	--	--	--
	Emission Unit 04 (104) Curing Process	Negligible	Negligible	49.25	1.19	61.35	2,005	0.20	89.00
Support Operations	Emission Unit 05 (105) Boiler 1	1.93	0.09	20.32	11.73	1.25	19,651	Negligible	Negligible
	Emission Unit 06 (106) Boiler 2	1.93	0.09	20.32	11.73	1.25	19,651	Negligible	Negligible
	Emission Unit 12 (112) Pesticide Fogging	--	--	--	--	0.55	--	--	--
	Emission Unit 13 (113) Fire Pump	0.13	0.01	6.48	1.08	0.18	1,216	Negligible	Negligible
Tobacco Finishing	Emission Unit 14 (114) Finishing Operation	--	--	--	--	141.7	--	--	--
Insignificant Activities	Pressurized propane tanks	--	--	--	--	Negligible	--	--	--
	Small parts cleaners	--	--	--	--	0.25	--	--	--
	Laboratory fume hoods for physical/chemical analyses	--	--	--	--	Negligible	--	Negligible	--
	Curing Room Heater	0.06	Negligible	0.79	0.66	0.04	948.45	--	--
	Cure Bin Washing Operation	--	--	--	--	Negligible	--	--	--
	Rolling Bin Washing Operation	--	--	--	--	Negligible	--	--	--
Site-wide PTE		432.6	0.2	100.0	28.0	514.7	46,216	0.20	103.2

Table 2
U.S. Smokeless Tobacco Co. - Eagle One Facility
Site-wide Controlled and Limited Potential to Emit (PTE) Summary

May 2025

Emission Unit		Controlled and Limited PTE (tons/yr)							
		PM / PM ₁₀	SO ₂	NO _x	CO	VOC	GHG	HAPs	NH3
Dry Flour Plant	Emission Unit 01 (101) Dry Flour Casing Process	11.63	--	--	--	5.09	--	--	--
	Emission Unit 02 (102) Dry Flour Drying Process	8.89	Negligible	0.72	0.42	15.84	704	--	3.65
Tobacco Curing Operation	Emission Unit 03 (103) Into Cure Process	--	--	--	--	46.70	--	--	--
	Emission Unit 04 (104) Curing Process	Negligible	Negligible	49.25	1.19	61.35	2,005	0.20	71.56
Support Operations	Emission Unit 05 (105) Boiler 1	1.93	0.09	20.32	11.73	1.25	19,651	Negligible	Negligible
	Emission Unit 06 (106) Boiler 2	1.93	0.09	20.32	11.73	1.25	19,651	Negligible	Negligible
	Emission Unit 12 (112) Pesticide Fogging	--	--	--	--	0.55	--	--	--
	Emission Unit 13 (113) Fire Pump	0.007	0.001	0.37	0.06	0.01	69.44	Negligible	Negligible
Tobacco Finishing	Emission Unit 14 (114) Finishing Operation	--	--	--	--	63.24	--	--	--
Insignificant Activities	Pressurized propane tanks	--	--	--	--	Negligible	--	--	--
	Small parts cleaners	--	--	--	--	0.25	--	--	--
	Laboratory fume hoods for physical/chemical analyses	--	--	--	--	Negligible	--	Negligible	--
	Curing Room Heater	0.06	Negligible	0.79	0.66	0.04	948.45	--	--
	Cure Bin Washing Operation	--	--	--	--	Negligible	--	--	--
	Rolling Bin Washing Operation	--	--	--	--	Negligible	--	--	--
Site-wide PTE		24.5	0.2	91.8	25.8	195.6	43,030	0.20	75.2

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007AI

Administrative Information

- ___ Section AI.1: Source Information
___ Section AI.2: Applicant Information
___ Section AI.3: Owner Information
___ Section AI.4: Type of Application
___ Section AI.5: Other Required Information
___ Section AI.6: Signature Block
~~___ Section AI.7: Notes, Comments, and Explanations~~

Additional Documentation

___ Additional Documentation attached

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: 25-Apr-25

Section AI.1: Source Information

Physical Location Street: 100 Weyman's Way

Address: City: Hopkinsville County: Christian Zip Code: 42240

Mailing Address: Street or P.O. Box: P.O. Box 85107

City: Richmond State: VA Zip Code: 23285

Standard Coordinates for Source Physical Location

Longitude: -87.467 (decimal degrees) Latitude: 36.733 (decimal degrees)

Primary (NAICS) Category: Tobacco Manufacturing

Primary NAICS #: 312230

Classification (SIC) Category:		<u>Chewing and Smoking Tobacco</u>		Primary SIC #: <u>2131</u>	
Briefly discuss the type of business conducted at this site:		<u>This facility is engaged in the production of smokeless tobacco products.</u>			
Description of Area Surrounding Source:	☐ Rural Area	☒ Industrial Park	☐ Residential Area	Is any part of the source located on federal land?	☐ Yes
	☐ Urban Area	☐ Industrial Area	☐ Commercial Area		☒ No
			Number of Employees:	42	
Approximate distance to nearest residence or commercial property: <u>100 feet</u>		Property Area: <u>55 acres</u>		Is this source portable? ☐ Yes ☒ No	
What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?					
NPDES/KPDES:	☒ Currently Hold	☐ Need	☐ N/A		
Solid Waste:	☐ Currently Hold	☐ Need	☐ N/A		
RCRA:	☒ Currently Hold	☐ Need	☐ N/A		
UST:	☐ Currently Hold	☐ Need	☐ N/A		
Type of Regulated Waste Activity:	☐ Mixed Waste Generator	☐ Generator	☐ Recycler	☐ Other: _____	
	☐ U.S. Importer of Hazardous Waste	☐ Transporter	☐ Treatment/Storage/Disposal Facility	☐ N/A	

Section AI.2: Applicant Information**Applicant Name:** U.S. Smokeless Tobacco Company (USSTC)**Title:** (if individual) _____**Mailing Address:** **Street or P.O. Box:** P.O. Box 85107**City:** Richmond **State:** VA **Zip Code:** 23285**Email:** (if individual) _____**Phone:** (270) 707-1700**Technical Contact****Name:** Maurice Chemweno**Title:** Mgr. Environmental Engineering, ALCS**Mailing Address:** **Street or P.O. Box:** 601 E. Jackson Street
City: Richmond **State:** VA **Zip Code:** 23219**Email:** Maurice.K.Chemweno@altria.com**Phone:** (804) 335-2943**Air Permit Contact for Source****Name:** Reginald M. Harris**Title:** Sr. Environmental Engineer**Mailing Address:** **Street or P.O. Box:** 800 Harrison St
City: Nashville TN **State:** TN **Zip Code:** 37203**Email:** Reginald.m.harris@usthq.com**Phone:** (615) 880-4465

Section AI.3: Owner Information☒ **Owner same as applicant****Name:** _____**Title:** _____**Mailing Address:** **Street or P.O. Box:** _____
City: _____ **State:** _____ **Zip Code:** _____**Email:** _____**Phone:** _____**List names of owners and officers of the company who have an interest in the company of 5% or more.****Name****Position**

None

Section AI.4: Type of Application

Current Status:	☒ Title V	☐ Conditional Major	☐ State-Origin	☐ General Permit	☐ Registration	☐ None
	☐ Name Change	☐ Initial Registration	☐ Significant Revision	☐ Administrative Permit Amendment		
Requested Action: (check all that apply)	☒ Renewal Permit	☐ Revised Registration	☐ Minor Revision	☐ Initial Source-wide Operating Permit		
	☐ 502(b)(10) Change	☐ Extension Request	☐ Addition of New Facility	☐ Portable Plant Relocation Notice		
	☐ Revision	☐ Off Permit Change	☐ Landfill Alternate Compliance Submittal	☐ Modification of Existing Facilities		
	☐ Ownership Change	☐ Closure				
Requested Status:	☒ Title V	☐ Conditional Major	☐ State-Origin	☐ PSD	☐ NSR	☐ Other: _____

Is the source requesting a limitation of potential emissions?		☒ Yes	☐ No
Pollutant:	Requested Limit:	Pollutant:	Requested Limit:
☐ Particulate Matter	_____	☐ Single HAP	_____
☒ Volatile Organic Compounds (VOC)	<u>196 tpy (site-wide -Section D)</u>	☐ Combined HAPs	_____
☐ Carbon Monoxide	_____	☐ Air Toxics (40 CFR 68, Subpart F)	_____
☐ Nitrogen Oxides	_____	☐ Carbon Dioxide	_____
☐ Sulfur Dioxide	_____	☐ Greenhouse Gases (GHG)	_____
☐ Lead	_____	☐ Other	_____

For New Construction:

Proposed Start Date of Construction:
(MM/YYYY)

Proposed Operation Start-Up Date: (MM/YYYY)

For Modifications:

Proposed Start Date of Modification:
(MM/YYYY)

Proposed Operation Start-Up Date: (MM/YYYY)

Applicant is seeking coverage under a permit shield.

☐ Yes

☒ No

Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.

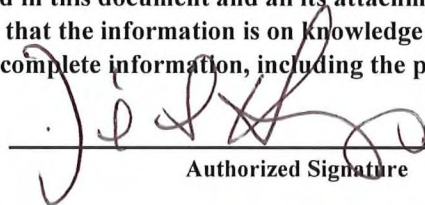
Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

- | | |
|--|--|
| ☒ DEP7007A Indirect Heat Exchangers and Turbines | ☒ DEP7007CC Compliance Certification |
| ☒ DEP7007B Manufacturing or Processing Operations | ☒ DEP7007DD Insignificant Activities |
| ☐ DEP7007C Incinerators and Waste Burners | ☒ DEP7007EE Internal Combustion Engines |
| ☐ DEP7007F Episode Standby Plan | ☐ DEP7007FF Secondary Aluminum Processing |
| ☐ DEP7007J Volatile Liquid Storage | ☒ DEP7007GG Control Equipment |
| ☐ DEP7007K Surface Coating or Printing Operations | ☐ DEP7007HH Haul Roads |
| ☐ DEP7007L Mineral Processes | ☐ Confidentiality Claim |
| ☐ DEP7007M Metal Cleaning Degreasers | ☐ Ownership Change Form |
| ☒ DEP7007N Source Emissions Profile | ☐ Secretary of State Certificate |
| ☐ DEP7007P Perchloroethylene Dry Cleaning Systems | ☒ Flowcharts or diagrams depicting process |
| ☐ DEP7007R Emission Offset Credit | ☐ Digital Line Graphs (DLG) files of buildings, roads, etc. |
| ☐ DEP7007S Service Stations | ☒ Site Map |
| ☐ DEP7007T Metal Plating and Surface Treatment Operations | ☒ Map or drawing depicting location of facility |
| ☒ DEP7007V Applicable Requirements and Compliance Activities | ☐ Safety Data Sheet (SDS) |
| ☐ DEP7007Y Good Engineering Practice and Stack Height Determination | ☐ Emergency Response Plan |
| ☐ DEP7007AA Compliance Schedule for Non-complying Emission Units | ☐ Other: _____ |
| ☐ DEP7007BB Certified Progress Report | |

Section AI.6: Signature Block

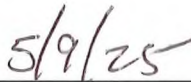
I, the undersigned, hereby certify under penalty of law, that I am a responsible official*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.



 Authorized Signature

Daniel Heltsley

 Type or Printed Name of Signatory



 Date

Sr. Director Plant Operations Hopkinsville

 Title of Signatory

*Responsible official as defined by 401 KAR 52:001.

Dry Flour Plant

Eagle One Facility
U.S. Smokeless Tobacco Company
Hopkinsville, KY

Unchanged Units

- ♦ Emission Unit 01 (101) Dry Flour Casing and Cutting Process –
Process Description, Process Flow Diagram, and Forms DEP7007B,
DEP7007N, and DEP7007V
- ♦ Emission Unit 02 (102) Dry Flour Drying Process –
Process Description, Process Flow Diagram, and Forms DEP7007B,
DEP7007N, and DEP7007V

Dry Flour Plant Process Description

The Dry Flour Plant consists of Emission Unit 01 (101) Dry Flour Casing and Cutting Process and Emission Unit 02 (102) Dry Flour Drying Process described in the next section.

EMISSION UNIT 01 (101) DRY FLOUR CASING AND CUTTING PROCESS

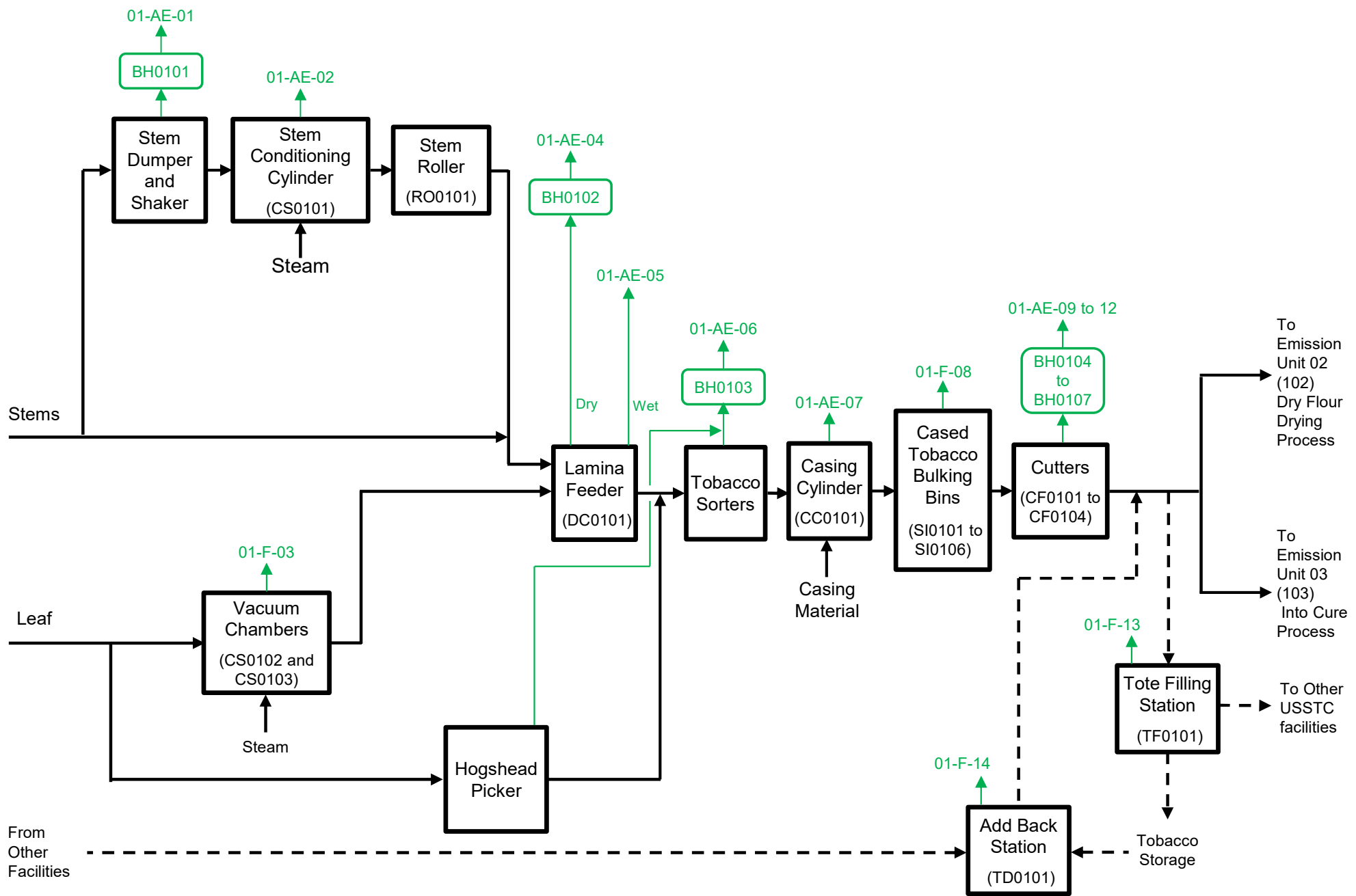
There are no changes planned that impact Emission Unit 01. For reference, the process is described below.

Tobacco stems enter the process in either of two locations: the stem dumper and shaker or the lamina feeder which bypasses the stem processing step. The stem feeder is used to transfer stems to the stem conditioning cylinder. The stem feeder has hoods at various points that pick up generated dust and route it to a 5,000 cfm global dust collector (BH0101) for control of particulate matter. The conditioning cylinder applies steam to the tobacco stems before they enter the stem roller. The flattened tobacco stems from the stem roller are transported to the lamina feeder for continued processing.

Tobacco Leaf enters the process in either of two locations: the vacuum chambers or the hogshead picker. The vacuum chambers apply steam to the tobacco leaf before the leaf enters the lamina feeder. Dust pickup hoods associated with the lamina feeder (dry material operation) are routed to a 9,000 cfm global dust collector (BH0102) for control of particulate matter.

Leaf tobacco can also go through the hogshead picker where the leaf is removed from its storage container and added to the process before the tobacco sorters. Tobacco stem and leaf from the lamina feeder and/or hogshead picker are run through the tobacco sorters to remove any non-tobacco material. Dust pickup hoods associated with the hogshead picker, the tobacco sorters, and various conveyors are routed to a 30,000 cfm global dust collector (BH0103) for control of particulate matter. Tobacco then enters the casing cylinder where liquid materials are applied to the tobacco. Cased tobacco is temporarily stored in bulking bins then sent through cutters as the final step of the Dry Flour Casing and Cutting Process. The four cutters are each equipped with a dust collector.

The resulting product is transferred to Emission Unit 02 (102) Dry Flour Drying Process, Emission Unit 03 (103) Into Cure Process, or the Tote Filling Station (TF0101) to allow for on-site storage or transfer off site. Stored tobacco re-enters the process via the Add Back Station (TD0101). As a contingency, cut tobacco from other facilities can also be introduced via the Add Back Station (TD0101). A process flow diagram for Emission Unit 01 (101) Dry Flour Casing and Cutting Process is provided as **Figure 3**.



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DEP7007B

Manufacturing or Processing Operations

- Section B.1: Process Information
Section B.2: Materials and Fuel Information
~~Section B.3: Notes, Comments, and Explanations~~

Additional Documentation

- Complete DEP7007A1, DEP7007N, DEP7007V, and DEP7007GG.
Attach a flow diagram
Attach SDS

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: April 2025

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process <u>Continuous</u> or <u>Batch</u> ?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
01 (101)	Dry Flour Casing and Cutting Process	see process description	BH0101	Stem Dumper and Shaker			2015	Continuous		
			CS0101	Stem Conditioning Cylinder			2015	Continuous		
			CS0102 & CS0103	Two Vacuum Chambers			2015	Continuous		
			BH0102	Lamina Feeder Dry Material			2015	Continuous		
			DC0101	Lamina Feeder Wet Material			2015	Continuous		
			BH0103	Tobacco Sorter, Hogshead Picker, Conveyors			2015	Continuous		
			CC0101	Casing Cylinder			2015	Continuous		
			SI0101 to SI0106	Six Bulking Bins			2015	Continuous		
			CF0101 to CF0104	Four Cutters			2015	Continuous		
			TF0101	Tote Filling Station			2015	Continuous		
			TD0101	Add Back Station			2015	Continuous		

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
01 (101)	Dry Flour Casing and Cutting Process	Tobacco Stems	2.5	tons/hr	2.5	Cut and Cased Tobacco	2.5	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Tobacco Leaf	12	tons/hr	12	Cut and Cased Tobacco	12	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Total Tobacco Stems and Leaf	12	tons/hr	12	Cut and Cased Tobacco	12	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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DEP7007N

Source Emissions Profile

- [__ Section N.1: Emission Summary](#)
[__ Section N.2: Stack Information](#)
[__ Section N.3: Fugitive Information](#)
[__ Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

___ Complete DEP7007AI

Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)

Agency Interest (AI) ID: [121768](#)

Date: [April 2025](#)

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
01 (101)	Dry Flour Casing and Cutting Process	BH0101	Stem Dumper and Shaker	Global Dust Collector	BH0101	01-AE-01	2.5	PM	1.714	Engr. Est.	100%	90%	4.29	0.43	18.77	1.88
		CS0101	Stem Conditioning Cylinder			01-AE-02	2.5	PM	0.140	Engr. Est.			0.35	0.35	1.53	1.53
		CS0102 & CS0103	Two Vacuum Chambers			01-F-03	12 (Total)	PM	0.020	Engr. Est.			0.24	0.24	1.05	0.22
		BH0102	Lamina Feeder Dry Material	Global Dust Collector	BH0102	01-AE-04	12.0	PM	1.286	Engr. Est.	100%	90%	15.43	1.54	67.58	1.45
		DC0101	Lamina Feeder Wet Material			01-AE-05	12.0	PM	0.061	Engr. Est.			0.73	0.73	3.21	0.69

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
01 (101)	Dry Flour Casing and Cutting Process	BH0103	Tobacco Sorter, Hogshead Picker, Conveyors	Global Dust Collector	BH0103	01-AE-06	12.0	PM	2.143	Engr. Est.	100%	90%	25.71	2.57	112.63	2.41
		CC0101	Casing Cylinder			01-AE-07	12.0	PM	0.061	Engr. Est.			0.73	0.73	3.21	0.69
		SI0101 to SI0106	Six Bulking Bins			01-F-08	12 (Total)	PM	0.061	Engr. Est.			0.73	0.73	3.21	0.69
		CF0101 to CF0104	Four Cutters	Dust Collectors	BH0104 to BH0107	01-AE-09 through 01-AE-12	12(Total)	PM	0.131	Engr. Est.	100%	90%	1.58	0.16	6.91	0.15
		TF0101	Tote Filling Station			01-F-13	12.0	PM	0.086	Engr. Est.			1.03	1.03	4.52	0.97
		TD0101	Add Back Station			01-F-14	12.0	PM	0.086	Engr. Est.			1.03	1.03	4.52	0.97

Division for Air Quality

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DEP7007N

Source Emissions Profile

- [___ Section N.1: Emission Summary](#)
[___ Section N.2: Stack Information](#)
[___ Section N.3: Fugitive Information](#)
[___ Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

___ Complete DEP7007AI

Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)

Agency Interest (AI) ID: [121768](#)

Date: [April 2025](#)

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
01 (101)	Dry Flour Casing and Cutting Process	BH0101	Stem Dumper and Shaker			01-AE-01	2.5	VOC	0.031	Engr. Est.			0.08	0.08	0.34	0.34
		CS0101	Stem Conditioning Cylinder			01-AE-02	2.5	VOC	0.089	Engr. Est.			0.22	0.22	0.97	0.97
		CS0102 & CS0103	Two Vacuum Chambers			01-F-03	12 (Total)	VOC	0.017	Engr. Est.			0.20	0.20	0.88	0.19
		BH0102	Lamina Feeder Dry Material			01-AE-04	12.0	VOC	0.012	Engr. Est.			0.14	0.14	0.62	0.13
		DC0101	Lamina Feeder Wet Material			01-AE-05	12.0	VOC	0.039	Engr. Est.			0.47	0.47	2.05	0.44

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
01 (101)	Dry Flour Casing and Cutting Process	BH0103	Tobacco Sorter, Hogshead Picker, Conveyors			01-AE-06	12.0	VOC	0.195	Engr. Est.			2.34	2.34	10.25	2.19
		CC0101	Casing Cylinder			01-AE-07	12.0	VOC	0.063	Engr. Est.			0.76	0.76	3.31	0.71
		SI0101 to S10106	Six Bulking Bins			01-F-08	12 (Total)	VOC	0.000	Engr. Est.			0.00	0.00	0.00	0.00
		CF0101 to CF0104	Four Cutters			01-AE-09 through 01-AE-12	12(Total)	VOC	0.011	Engr. Est.			0.13	0.13	0.57	0.12
		TF0101	Tote Filling Station			01-F-13	12.0	VOC	N/A	Engr. Est.						
		TD0101	Add Back Station			01-F-14	12.0	VOC	N/A	Engr. Est.						

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (°F)	Exit Velocity (ft/sec)
01-AE-01	Process: BH0101 Control: BH0101	2.30	19.50	0.00			5,000	Ambient	20.06
01-AE-02	Process: CS0101 Control: None	0.71	41.33	1.00			1,500	110.00	63.44
01-AE-04	Process: BH0102 Control: BH0102	2.30	19.50	3.00			9,000	Ambient	36.10
01-AE-05	Process: DC0101 Control: None	1.33	43.50	4.00			6,000	Ambient	71.98
01-AE-06	Process: BH0103 Control: BH0103	3.30	22.50	5.00			30,000	Ambient	58.46
01-AE-07	Process: CC0101 Control: None	0.71	41.33	6.00			1,500	Ambient	63.44
01-AE-09 through 01-AE-12	Process: CF0101 to CF0104 Control: BH0104 to BH0107	0.50	10.58	8.00			230	Ambient	19.52

Section N.3: Fugitive Information**UTM Zone:**

Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)
01 (101)	Dry Flour Casing and Cutting Process	CS0102 & CS0103					110	4
		SI0101 to S10106					Ambient	8
		TF0101					Ambient	4
		TD0101					Ambient	4

Section N.4: Notes, Comments, and Explanations

EU01 is limited in the permit to 22,482 tons per year of total tobacco. The portion of this that can come from stems is no more than 21,900. These number are used to calculate the controlled potential emissions.

Division for Air Quality

300 Sower Boulevard

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DEP7007GG

Control Equipment

Additional Documentation

___ Complete Sections GG.1 through GG.12, as applicable

___ Attach manufacturer's specifications for each control device

___ Complete DEP7007AI

Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)Agency Interest (AI) ID: [121768](#)Date: [April 2025](#)

Section GG.1: General Information - Control Equipment

Control Device ID #	Control Device Name	Cost	Manufacturer	Model Name/ Serial #	Date Installed	Inlet Gas Stream Data For <u>All</u> Control Devices					Inlet Gas Stream Data For Condensers, Adsorbers, Afterburners, Incinerators, Oxidizers <u>Only</u>			Equipment Operational Data For <u>All</u> Control Devices		
						Temperature (°F)	Flowrate (scfm @ 68 °F)	Average Particle Diameter (µm)	Particle Density (lb/ft ³) or Specific Gravity	Gas Density (lb/ft ³)	Gas Moisture Content (%)	Gas Composition	Fan Type	Pressure Drop Range (in. H ₂ O)	Pollutants Collected/ Controlled	Pollutant Removal (%)
BH0101	Global Dust Collector		Schenck Process, LLC	3M2F12 MAC2FLO FILTER	2015	Ambient	5,000 cfm	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	0.9
BH0102	Global Dust Collector		TBD	TBD	2015	Ambient	9,000 cfm	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	0.9
BH0103	Global Dust Collector		TBD	TBD	2015	Ambient	30,000 cfm	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	0.9
BH0104 to BH01017	Dust Collectors		Schenck Process, LLC	54AVR14 STY III FLTR	2015	Ambient	230 (each)	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	0.9

Section GG.6: Filter														
Control Device ID #	Identify all Emission Units and Control Devices that Feed to Filter	Identify Type of Filter Unit: Baghouse, Cartridge Collector, or Other (specify)	Identify Type of Filtering Material: Fabric, Paper, Synthetic, or Other (specify)	Total Filter Area (ft ²)	Effective Air-to-Filter Ratio (acfm/ft ²)	Continuous Monitoring Instrumentation (e.g. COMS, BLDS, none)	Additional Materials Introduced into the Control System (e.g. lime, carbon)		Identify Cleaning Method: Shaker, Pulse Air, Reverse Air, Pulse Jet, or Other (specify)	Identify Gas Cooling Method: Ductwork, Heat Exchanger, Bleed-in Air, Water Spray, or Other (specify)	For Ductwork:		For Bleed-in Air:	For Water Spray:
							Material	Injection Rate (lb/hr)			Length (ft)	Diameter (ft)	Flowrate (scfm @ 68°F)	Flowrate (gal/min)
BH0101	Stem Dumper and Shaker	Cartridge Collector	Non-woven polyester nanofiber cartridges	3,048	1.6	None	N/A	N/A	Reverse Air	N/A				
BH0102	Lamina Feeder Dry Material	Cartridge Collector	Non-woven polyester nanofiber cartridges	6,096	1.5	None	N/A	N/A	Reverse Air	N/A				
BH0103	Tobacco Sorter, Hogshead Picker, Conveyors	Cartridge Collector	Non-woven polyester nanofiber cartridges	16,256	1.8	None	N/A	N/A	Reverse Air	N/A				
BH0104 to BH0107	Four Cutters	Baghouse	bags	125	1.8	None	N/A	N/A	Reverse Air	N/A				

DEP7007V

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Applicable Requirements and Compliance Activities

- ☐ Section V.1: Emission and Operating Limitation(s)
☐ Section V.2: Monitoring Requirements
☐ Section V.3: Recordkeeping Requirements
☐ Section V.4: Reporting Requirements
☐ Section V.5: Testing Requirements
☒ ~~Section V.6: Notes, Comments, and Explanations~~

Additional Documentation

___ Complete DEP7007AI

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002Agency Interest (AI) ID: 121768Date: April 2025**Section V.1: Emission and Operating Limitation(s)**

Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
101	Dry Flour Casing Process	59:010 Section 3(2)	PM	PM (lb/hr) = $3.59 \times P^{0.62}$ (P = Hourly Processing Weight in tons/hr)			Emission Factor, Maximum Rated Capacity of the equipment, and Control Devices operating
		Permit condition	Throughput			22,482 tons total tobacco/year	Monthly and 12-Month Rolling Throughput records
		59:010 Section 3 (1)(a)	Opacity	20%			
		Permit condition	VOC	Part of 196 tpy site-wide limit under Section D			Formulas in Section D

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
101	Dry Flour Casing Process	PM	59:010 Section 3(2)	Operation	The control devices automatically turn on when the underlying processes are started.
		Throughput	Permit Condition	Operation	Production Records
		Opacity			Monthly visual observations (requested change to permit) Weekly visual observations

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
101	Dry Flour Casing Process	PM	Permit Condition	Production and Emission Rate	Production throughputs are totaled each month and used to calculate average hourly emissions
		Throughput	Permit Condition	Production	Production throughputs are totaled each month
		Opacity	None	Visual observations	Log of all qualitative visual observations of emissions from each stack, any corrective actions taken and any U.S. EPA Reference Method 9 readings performed

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
101	Dry Flour Casing Process	PM	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals
		Throughput	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals
		Opacity	None	None	None

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
101	Dry Flour Casing Process	PM	None	None	None
		Throughput	None	None	None
		Opacity	None	None	None

Dry Flour Plant Process Description

The Dry Flour Plant consists of Emission Unit 01 (101) Dry Flour Casing and Cutting Process described in the previous section and Emission Unit 02 (102) Dry Flour Drying Process.

EMISSION UNIT 02 (102) DRY FLOUR DRYING PROCESS

There are no changes planned that impact Emission Unit 02. For reference, the process is described below.

Cased and cut tobacco that is processed in the Dry Flour Drying Process is dried in either the fluidized bed drying line (102A) or the DLL drying line (102B). Cased and cut tobacco enters this process from Emission Unit 01 (101) Dry Flour Casing and Cutting Process or from other USSTC facilities.

Fluidized Bed Drying Line

The fluidized bed drying line has a fluidized bed dryer that allows the hot air to dry the tobacco. The fluidized bed dryer combusts natural gas to provide heat for drying and particulate emissions are controlled by a cyclone (CY0201). A small amount of dust is captured by a dust collector (BH0201) and is returned to the process.

After the tobacco exits the fluidized bed dryer, it is either transferred into totes or transported to the sifting operation by enclosed drag chain conveyors. Tobacco that enters the sifting operation is screened and the oversized pieces are isolated and resized. Sifted tobacco is either placed into totes or transported to a surge silo. A 4,000 cfm global dust collector (BH0202) is used to control particulate emissions from the conveyors, sifters, tote filling station and surge silo.

Sifted tobacco in the surge silo is pneumatically conveyed to a truck filling station equipped with a dust collector (BH0204). Processed tobacco (in hopper trucks or in totes) is shipped to other USSTC facilities.

DLL Drying Line

The DLL dryer line has a DLL dryer that uses steam to dry the tobacco. The DLL dryer has a cyclone (CY0202) that controls particulate emissions from the dryer. After the tobacco exits the DLL dryer, it is either transferred into totes or transported to the sifting operation by enclosed drag chain conveyors. Tobacco that enters the sifting operation is screened and the oversized pieces are isolated and resized. Sifted tobacco is either placed into totes or transported to the surge silo.

A 4,000 cfm global dust collector (BH0205) is used to control particulate emissions from the conveyors, sifters, tote filling station and surge silo.

Sifted tobacco in the surge silo is pneumatically conveyed to a truck filling station equipped with a dust collector (BH0207). Processed tobacco (in hopper trucks or in totes) is shipped to other USSTC facilities.

A simplified process flow diagram for Emission Unit 02 (102) Dry Flour Drying Process is provided as **Figure 4**.

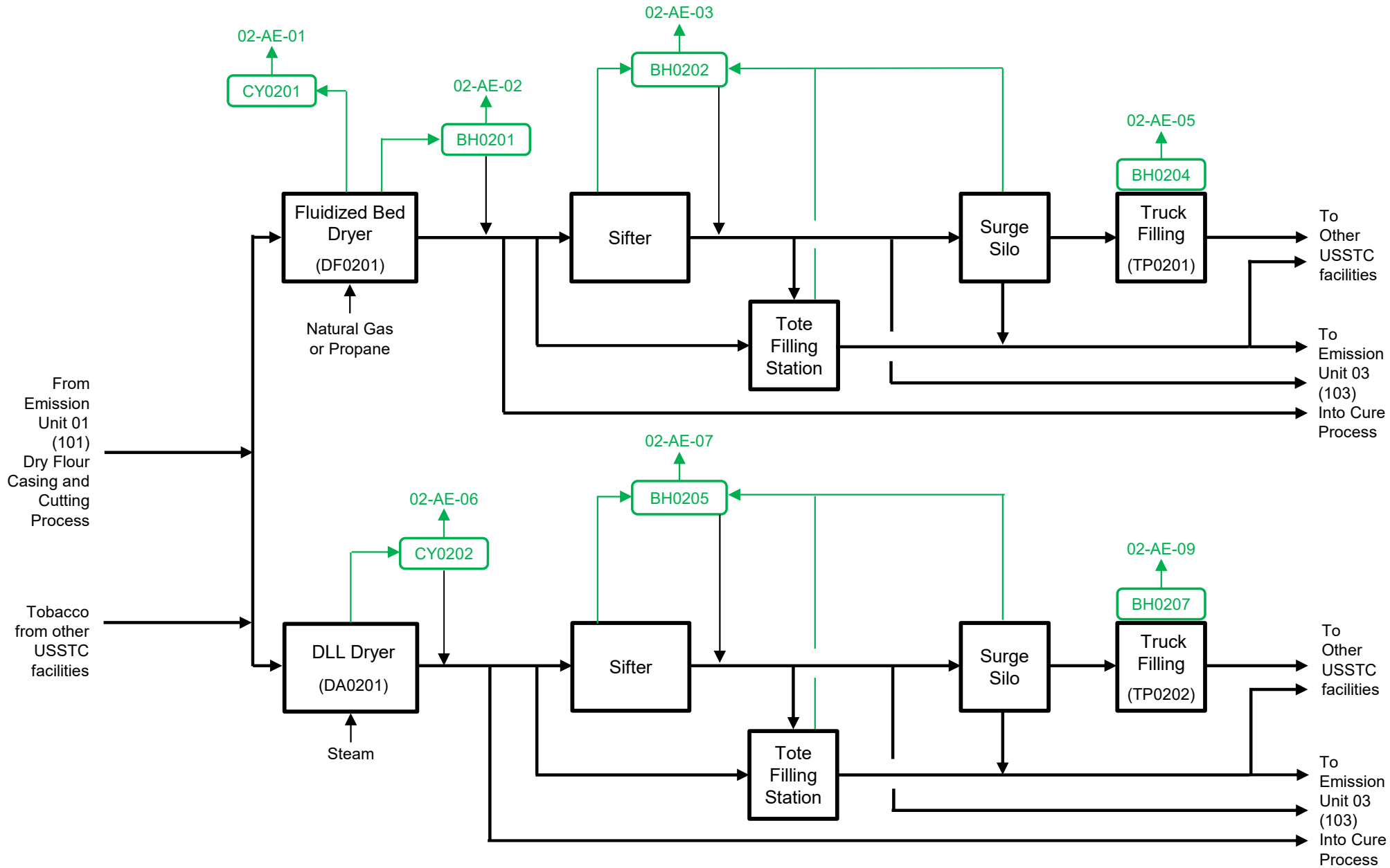


Figure 4
Emission Unit 02 (102) Dry Flour Drying Process

May 2025

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DEP7007B

Manufacturing or Processing Operations

- Section B.1: Process Information
Section B.2: Materials and Fuel Information
~~Section B.3: Notes, Comments, and Explanations~~

Additional Documentation

- Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
Attach a flow diagram
Attach SDS

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: April 2025

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process <u>Continuous</u> or <u>Batch</u> ?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
02 (102)	Dry Flour Drying Process	see process description								
			Fluidized Bed Drying Line 102A							
			DF0201	Fluidized Bed Dryer			2015	Continuous		
			BH0201	Fluidized Bed Dryer Dust Return			2015	Continuous		
			BH0202	Conveyors, Sifting, Tote Filling, and Surge Silo			2015	Continuous		
			TP0201	Truck Filling			2015	Continuous		
			DLL Drying Line 102B							
			DA0201	DLL Dryer			2015	Continuous		
			BH0205	Conveyors, Sifting, Tote Filling, and Surge Silo			2015	Continuous		
			TP0202	Truck Filling			2015	Continuous		

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
02 (102)	Dry Flour Drying Process														
	Fluidized Bed Drying Line 102A														
		Cased Tobacco	5	tons/hr	5	Cased Tobacco	5	tons/hr	Propane (primary)	49.2	gal	No Limit requested (exhausts with process)		negligible	N/A
									Natural Gas (alternate primary)	4500	scf	No Limit requested (exhausts with process)		N/A	N/A
	DLL Drying Line 102B														
		Cased Tobacco	5	tons/hr	5	Cased Tobacco	5	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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DEP7007N

Source Emissions Profile

- [__ Section N.1: Emission Summary](#)
[__ Section N.2: Stack Information](#)
[__ ~~Section N.3: Fugitive Information~~](#)
[__ Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

__ Complete DEP7007AI

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility
 KY EIS (AFS) #: 21-
 Permit #: V-20-002
 Agency Interest (AI) ID: 121768
 Date: April 2025

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions		
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)	
02 (102)	Dry Flour Drying Process																
		Fluidized Bed Drying Line 102A															
		DF0201	Fluidized Bed Dryer	Cyclone	CY0201	02-AE-01	5.0	PM	4.000	Engr. Est.	100%	75%	20.00	5.00	87.60	5.62	
		BH0201	Fluidized Bed Dryer Dust Return	Dust Collector	BH0201	02-AE-02	5.0	PM	0.429	Engr. Est.	100%	96%	2.14	0.09	9.39	0.10	
		BH0202	Conveyors, Sifting, Tote Filling, and Surge Silo	Global Dust Collector	BH0202	02-AE-03	5.0	PM	1.371	Engr. Est.	100%	90%	6.86	0.69	30.03	0.77	
		TP0201	Truck Filling	Dust Collector	BH0204	02-AE-05	5.0	PM	0.513	Engr. Est.	100%	96%	2.57	0.10	11.24	0.12	
		DLL Drying Line 102B															
		DA0201	DLL Dryer	Dust Collector	CY0202	02-AE-06	5.0	PM	1.000	Engr. Est.	100%	75%	5.00	1.25	21.90	1.41	
		BH0205	Conveyors, Sifting, Tote Filling, and Surge Silo	Dust Collector	BH0205	02-AE-07	5.0	PM	1.371	Engr. Est.	100%	90%	6.86	0.69	30.03	0.77	
		TP0202	Truck Filling	Dust Collector	BH0207	02-AE-09	5.0	PM	0.513	Engr. Est.	100%	96%	2.57	0.10	11.24	0.12	

Division for Air Quality

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DEP7007N

Source Emissions Profile

- [__ Section N.1: Emission Summary](#)
[__ Section N.2: Stack Information](#)
[__ ~~Section N.3: Fugitive Information~~](#)
[__ Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

__ Complete DEP7007AI

Source Name:

[U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #:

21-

Permit #:

[V-20-002](#)

Agency Interest (AI) ID:

[121768](#)

Date:

[April 2025](#)

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions		
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)	
02 (102)	Dry Flour Drying Process																
		Fluidized Bed Drying Line 102A															
		DF0201	Fluidized Bed Dryer			02-AE-01	5.0	VOC	2.100	Engr. Est.			10.50	10.50	45.99	11.80	
		BH0201	Fluidized Bed Dryer Dust Return			02-AE-02	5.0	VOC	0.039	Engr. Est.			0.20	0.20	0.86	0.22	
		BH0202	Conveyors, Sifting, Tote Filling, and Surge Silo			02-AE-03	5.0	VOC	0.169	Engr. Est.			0.84	0.84	3.69	0.95	
		TP0201	Truck Filling			02-AE-05	5.0	VOC	0.017	Engr. Est.			0.08	0.08	0.37	0.09	
		DLL Drying Line 102B															
		DA0201	DLL Dryer			02-AE-06	5.0	VOC	0.308	Engr. Est.			1.54	1.54	6.75	1.73	
		BH0205	Conveyors, Sifting, Tote Filling, and Surge Silo			02-AE-07	5.0	VOC	0.169	Engr. Est.			0.84	0.84	3.69	0.95	
		TP0202	Truck Filling			02-AE-09	5.0	VOC	0.017	Engr. Est.			0.08	0.08	0.37	0.09	

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999						DEP7007N Source Emissions Profile __ Section N.1: Emission Summary __ Section N.2: Stack Information Section N.3: Fugitive Information __ Section N.4: Notes, Comments, and Explanations								Additional Documentation __ Complete DEP7007AI			
Source Name:						U.S. Smokeless Tobacco Company - Eagle One Facility											
KY EIS (AFS) #:						21-											
Permit #:						V-20-002											
Agency Interest (AI) ID:						121768											
Date:						April 2025											
N.1: Emission Summary																	
Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions		
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)	
02 (102)	Dry Flour Drying Process																
		Fluidized Bed Drying Line 102A															
		DF0201	Fluidized Bed Dryer			02-AE-01	5.0	NOx	0.128	Engr. Est.			0.64	0.64	2.80	0.72	
							5.0	CO	0.076	Engr. Est.			0.38	0.38	1.66	0.42	
							5.0	NH3	0.325	Engr. Est.			1.63	1.63	7.12	1.83	
		DLL Drying Line 102B															
		DA0201	DLL Dryer			02-AE-06	5.0	NH3	0.325	Engr. Est.			1.63	1.63	7.12	1.83	

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (°F)	Exit Velocity (ft/sec)
Fluidized Bed Drying Line 102A									
02-AE-01	Process: DF0201 Control: CY0201	3.00	59	0			26,625	200	62.78
02-AE-02	Process: BH0201 Control: BH0201	1.20	12	0			500	200	7.37
02-AE-03	Process: BH0202 Control: BH0202	2.30	17	0			4,000	75	16.05
02-AE-05	Process: TP0201 Control: TP0201	0.83	12	0			500	75	15.28
DLL Drying Line 102B									
02-AE-06	Process: DA0201 Control: DA0201	2.50	59	0			5,445	115	18.49
02-AE-07	Process: BH0205 Control: BH0205	2.30	17	0			4,000	75	16.05
02-AE-09	Process: TP0202 Control: TP0202	0.83	12	0			500	75	15.28

Section N.4: Notes, Comments, and Explanations

EU02, DLL Drying Line 102B, is limited in the permit to 11,241 tons per year of total tobacco.

EU02, Fluidized Bed Drying Line 102A, is limited in the permit to 11,241 tons per year of total tobacco.

These are the throughputs used in the annual PTE calculations.

Division for Air Quality

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DEP7007GG

Control Equipment

Additional Documentation

___ Complete Sections GG.1 through GG.12, as applicable

___ Attach manufacturer's specifications for each control device

___ Complete DEP7007AI

Source Name: [Emission Unit 02 \(102\) Dry Flour Drying Process](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)Agency Interest (AI) ID: [121768](#)Date: [April 2025](#)

Section GG.1: General Information - Control Equipment

Control Device ID #	Control Device Name	Cost	Manufacturer	Model Name/ Serial #	Date Installed	Inlet Gas Stream Data For <u>All</u> Control Devices					Inlet Gas Stream Data For Condensers, Adsorbers, Afterburners, Incinerators, Oxidizers <u>Only</u>			Equipment Operational Data For <u>All</u> Control Devices		
						Temperature (°F)	Flowrate (scfm @ 68 °F)	Average Particle Diameter (µm)	Particle Density (lb/ft ³) or Specific Gravity	Gas Density (lb/ft ³)	Gas Moisture Content (%)	Gas Composition	Fan Type	Pressure Drop Range (in. H ₂ O)	Pollutants Collected/ Controlled	Pollutant Removal (%)
CY0201	Cyclone		Fisher Klosterman	XQ240-26-2	2015	200	21,300	< 100 um est.		0.073 (air)				manufacturer recommendation	PM	75%
BH0201	Dust Collector		Schenck Process, LLC	54AVR21 STY III FLTR	2015	200	400	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	96%
BH0202	Global Dust Collector		Schenck Process, LLC	3M2F12 MAC2FLO	2015	75	4,000	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	90%
BH0204	Dust Collector		Schenck Process, LLC	54AVR21 STY III FLTR	2015	75	500	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	96%
CY0202	Dust Collector		Garbuio Dickinson	Twin Cyclone (620 DIA)	2015	115	5,000	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	75%
BH0205	Dust Collector		Schenck Process, LLC	3M2F12 MAC2FLO	2015	75	4,000	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	90%
BH0207	Dust Collector		Schenck Process, LLC	54AVR21 STY III FLTR	2015	75	500	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	96%

Section GG.3: Cyclone											
Control Device ID #	Identify all Emission Units and Control Devices that Feed to Cyclone	Identify Number of Cyclones: Single <u>or</u> Multiple	Identify Type: High-Efficiency, Conventional, <u>or</u> High-Throughput	Inlet Height (ft)	Inlet Width (ft)	Bottom Cone Height (ft)	Body Height (ft)	Body Diameter (ft)	Dust Outlet Tube Diameter (ft)	Gas Outlet Tube Diameter (ft)	Vortex Finder Height (ft)
CY0201	Fluidized Bed Dryer	Single	High Efficiency								
CY0202	DLL Dryer	Dual	High Efficiency								

Section GG.6: Filter														
Control Device ID #	Identify all Emission Units and Control Devices that Feed to Filter	Identify Type of Filter Unit: Baghouse, Cartridge Collector, or Other (specify)	Identify Type of Filtering Material: Fabric, Paper, Synthetic, or Other (specify)	Total Filter Area (ft ²)	Effective Air-to-Filter Ratio (acfm/ft ²)	Continuous Monitoring Instrumentation (e.g. COMS, BLDS, none)	Additional Materials Introduced into the Control System (e.g. lime, carbon)		Identify Cleaning Method: Shaker, Pulse Air, Reverse Air, Pulse Jet, or Other (specify)	Identify Gas Cooling Method: Ductwork, Heat Exchanger, Bleed-in Air, Water Spray, or Other (specify)	For Ductwork:		For Bleed-in Air:	For Water Spray:
							Material	Injection Rate (lb/hr)			Length (ft)	Diameter (ft)	Flowrate (scfm @ 68°F)	Flowrate (gal/min)
BH0201	Fluidized Bed Dryer Dust Return	Baghouse	bags	187.53	2.1	None	N/A	N/A	Reverse Air	N/A				
BH0202	102A Conveyors, Sifting, Tote Filling, and Surge Silo	Cartridge Collector	Non-woven polyester nanofiber cartridges	3,048	1.3	None	N/A	N/A	Reverse Air	N/A				
BH0204	102A Truck Filling	Baghouse	bags	187.53	2.7	None	N/A	N/A	Reverse Air	N/A				
BH0205	102B Conveyors, Sifting, Tote Filling, and Surge Silo	Cartridge Collector	Non-woven polyester nanofiber cartridges	3,048	1.3	None	N/A	N/A	Reverse Air	N/A				
BH0207	102B Truck Filling	Baghouse	bags	187.53	2.7	None	N/A	N/A	Reverse Air	N/A				

DEP7007V

Division for Air Quality

300 Sower Boulevard
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Applicable Requirements and Compliance Activities

- ☐ Section V.1: Emission and Operating Limitation(s)
☐ Section V.2: Monitoring Requirements
☐ Section V.3: Recordkeeping Requirements
☐ Section V.4: Reporting Requirements
☐ Section V.5: Testing Requirements
☒ ~~Section V.6: Notes, Comments, and Explanations~~

Additional Documentation

___ Complete DEP7007AI

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002Agency Interest (AI) ID: 121768Date: April 2025**Section V.1: Emission and Operating Limitation(s)**

Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
102A 102B	Fluidized Bed Drying Line DLL Drying Line	59:010 Section 3(2)	PM	PM (lb/hr) = $3.59 \times P^{0.62}$ (P = Hourly Processing Weight in tons/hr)			Emission Factor, Maximum Rated Capacity of the equipment, and Control Devices operating
		Permit condition	Throughput			11,241 tons tobacco/year/line	Monthly and 12-Month Rolling Throughput records
		59:010 Section 3 (1)(a)	Opacity	20%			
		Permit condition	VOC	Part of 196 tpy site-wide limit under Section D			Formulas in Section D

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
102A 102B	Fluidized Bed Drying Line DLL Drying Line	PM	59:010 Section 3(2)	Operation	The control devices automatically turn on when the underlying processes are started.
		Throughput	Permit Condition	Operation	Production Records
		Opacity			Monthly visual observations (requested change to permit) Weekly visual observations

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
102A 102B	Fluidized Bed Drying Line DLL Drying Line	PM	Permit Condition	Production and Emission Rate	Production throughputs are totaled each month and used to calculate average hourly emissions
		Throughput	Permit Condition	Production	Production throughputs are totaled each month
		Opacity	None	Visual observations	Log of all qualitative visual observations of emissions from each stack, any corrective actions taken and any U.S. EPA Reference Method 9 readings performed

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
102A 102B	Fluidized Bed Drying Line DLL Drying Line	PM	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals
		Throughput	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals
		Opacity	None	None	None

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
102A 102B	Fluidized Bed Drying Line DLL Drying Line	PM	None	None	None
		Throughput	None	None	None
		Opacity	None	None	None

Tobacco Curing Operation

Eagle One Facility
U.S. Smokeless Tobacco Company
Hopkinsville, KY

Unchanged Units

- ♦ Emission Unit 03 (103): Into Cure Process –
Process Description, Process Flow Diagram, and Forms DEP7007B,
DEP7007N, and DEP7007V

- ♦ Emission Unit 04 (104): Curing Process –
Process Description, Process Flow Diagram, and Forms DEP7007B,
DEP7007N, and DEP7007V

Tobacco Curing Operation Process Description

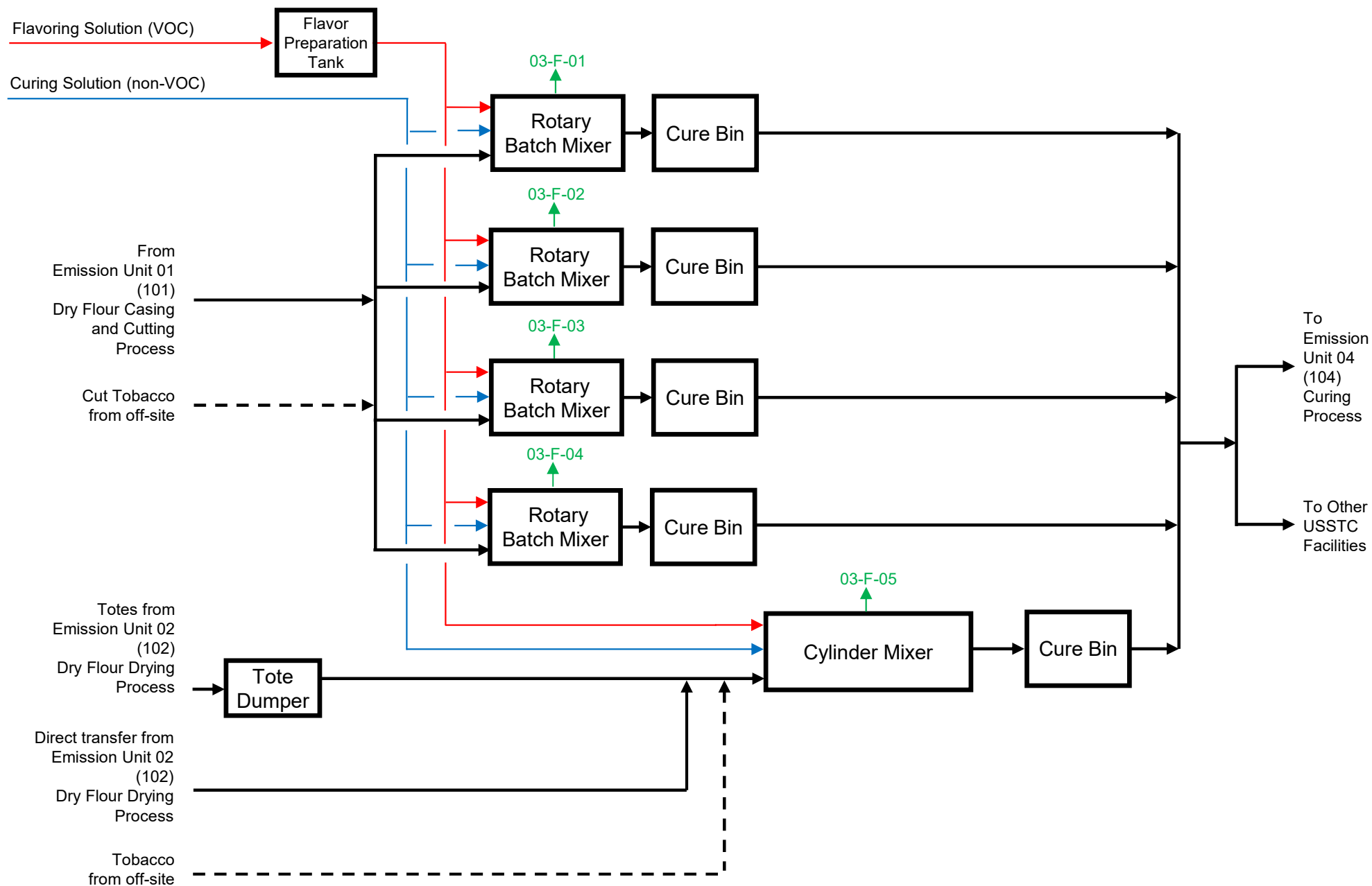
The Tobacco Curing Operation consists of Emission Unit 03 (103) Into Cure Process described below and Emission Unit 04 (104) Curing Process described in the next section.

EMISSION UNIT 03 (103) INTO CURE PROCESS

There are no changes planned that impact Emission Unit 03. For reference, the process is described below.

The Into Cure Process involves mixing Dry Flour tobacco with a curing solution and a flavor solution in batch mixers. Cased and cut tobacco enters this process from Emission Unit 01 (101) Dry Flour Casing and Cutting, from Emission Unit 02 (102) Dry Flour Drying Process, or from other USSTC facilities.

There are currently a total of four batch mixers that receive cased and cut tobacco. There is also a cylinder mixer to allow for mixing of low moisture Dry Flour tobacco produced in Emission Unit 02 with a curing solution and a flavor solution. Once tobacco enters in each mixer, curing and flavor solution is applied. After the application of the curing and flavor solution, the mixture is transferred into cure bins, which are used to store the mixture in the cure room. VOC emissions from the Into Cure Process occur during the addition of the flavor solution, which may contain ethanol. A portion of the ethanol in the flavor solution flashes during the application process. A process flow diagram for the Emission Unit 03 (103) Into Cure Process is provided as **Figure 5**.



Division for Air Quality

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DEP7007B

Manufacturing or Processing Operations

- Section B.1: Process Information
Section B.2: Materials and Fuel Information
~~Section B.3: Notes, Comments, and Explanations~~

Additional Documentation

- ☐ Complete DEP7007AI,
DEP7007N, DEP7007V, and
DEP7007GG.
☐ Attach a flow diagram
☐ Attach SDS

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: April 2025

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process Continuous or Batch?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
03 (103)	Into Cure Process	see process description	03-F-01 03-F-02 03-F-03 03-F-04	Four Rotary Batch Mixers			2015	Batch		
			03-F-05	Cylinder Mixer			2015	Batch		
			included in above	One or more 60 gallon blending/storage tanks for tobacco flavor solution			2015	Batch		

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
03 (103)	Into Cure Process	Tobacco	10	tons/hr	N/A	Tobacco Mixture (into cure tobacco)	16.67	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Curing Solution, Flavors (ethanol)	111.7	lbs/hr (ethanol)	N/A	included in above	included in above	included in above	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Division for Air Quality

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DEP7007N

Source Emissions Profile

- [___ Section N.1: Emission Summary](#)
[___ ~~Section N.2: Stack Information~~](#)
[___ Section N.3: Fugitive Information](#)
[___ Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

___ Complete DEP7007AI

Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)

Agency Interest (AI) ID: [121768](#)

Date: [April 2025](#)

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
03 (103)	Into Cure Process	03-F-01 03-F-02 03-F-03 03-F-04	Four Rotary Batch Mixers			03-F-01 03-F-02 03-F-03 03-F-04	16.67	VOC	3.116	Engr. Est.			51.94	51.94	227.5	46.70
		03-F-05	Cylinder Mixer			03-F-05	included in above	included in above	included in above	included in above			included in above	included in above	included in above	included in above
		included in above	One or more 60 gallon blending/storage tanks for tobacco flavor solution				included in above	included in above	included in above	included in above			included in above	included in above	included in above	included in above

Section N.3: Fugitive Information
UTM Zone:

Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)
03 (103)	Into Cure Process	03-F-01 03-F-02 03-F-03 03-F-04					Ambient	9
		03-F-05					Ambient	4

Section N.4: Notes, Comments, and Explanations

EU0103 is limited in the permit to 29,976 tons per year of total tobacco. This number is used to calculate the controlled potential emissions.

DEP7007V

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

Applicable Requirements and Compliance Activities

- ☐ Section V.1: Emission and Operating Limitation(s)
☐ Section V.2: Monitoring Requirements
☐ Section V.3: Recordkeeping Requirements
☐ Section V.4: Reporting Requirements
☐ Section V.5: Testing Requirements
☒ Section V.6: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002Agency Interest (AI) ID: 121768Date: April 2025**Section V.1: Emission and Operating Limitation(s)**

Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
103	Into Cure Process	Permit condition	Throughput			29,967 tons total tobacco/year	Monthly and 12-Month Rolling Throughput records
		Permit condition	VOC	Part of 196 tpy site-wide limit under Section D			Formulas in Section D

Section V.2: Monitoring Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
103	Into Cure Process	Throughput	Permit Condition	Operation	Production Records

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
103	Into Cure Process	Throughput	Permit Condition	Production	Production throughputs are totaled each month

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
103	Into Cure Process	Throughput	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
103	Into Cure Process	Throughput	None	None	None

Tobacco Curing Operation Process Description

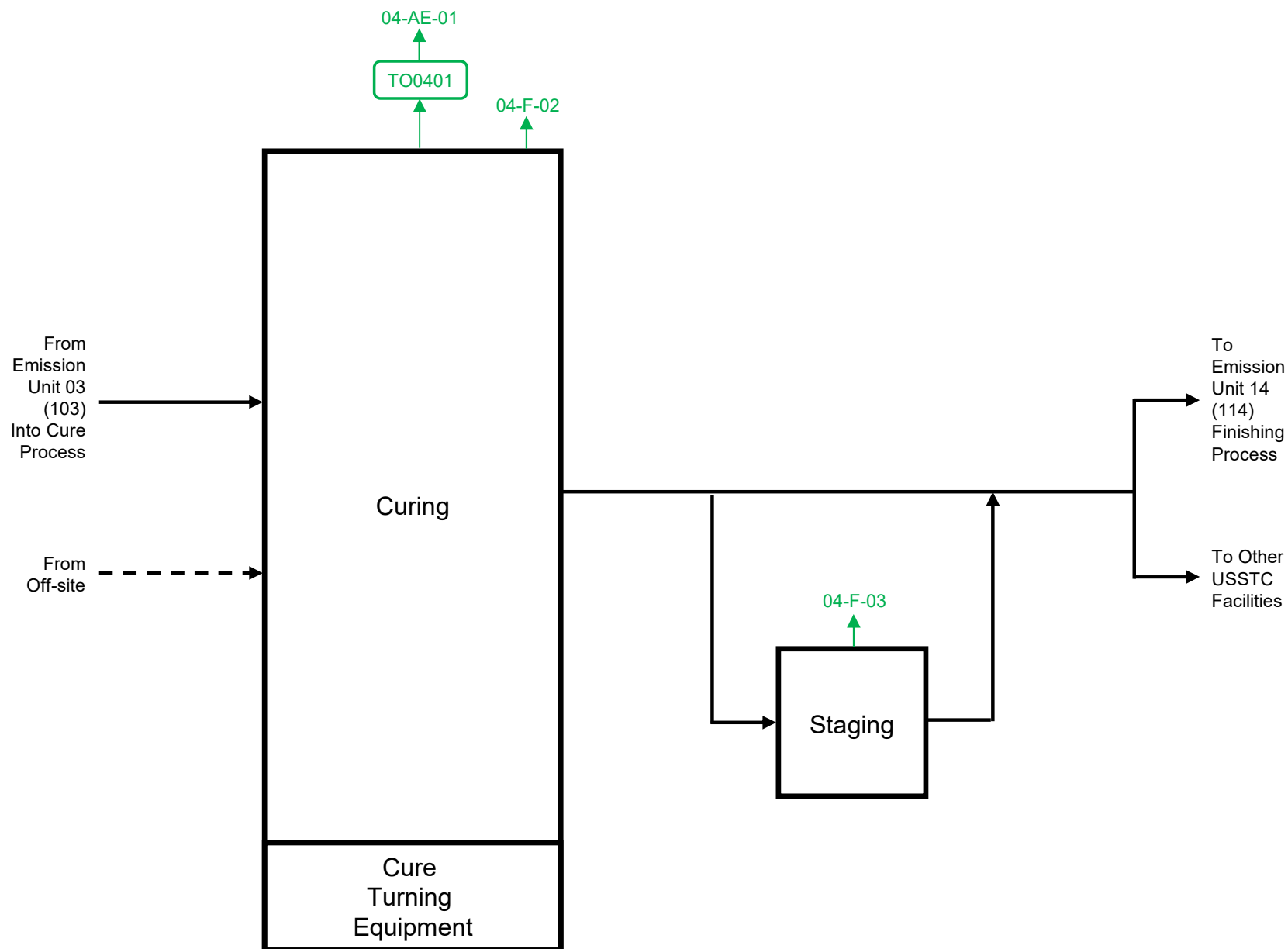
The Tobacco Curing Operation consists of Emission Unit 03 (103) Into Cure Process described in the previous section and Emission Unit 04 (104) Curing Process described below.

EMISSION UNIT 04 (104) CURING PROCESS

There are no changes planned that impact Emission Unit 04. For reference, the process is described below.

The Curing Process consists of a cure room and a cure turning room. Cure bins, containing tobacco with curing and flavoring solution, come from Emission Unit 03 (103) Into Cure Process or are brought in from other USSTC facilities and are placed in the cure room. The cure turning room consists of four cure turning stations, each consisting of a cure bin dumper, a lump breaker, and conveyors. At periodic intervals during the cure process, the cure bins are turned in the cure turning room and then returned to the cure room. During that time ethanol and other tobacco volatiles are emitted continuously and slowly as the tobacco cures. The cure rooms and the cure turning room are enclosed and the air space is vented to a regenerative thermal oxidizer (TO0401) for odor control.

Once the tobacco is finished curing, it is removed from the cure room and either transferred to Emission Unit 14 (114) Tobacco Finishing Process or shipped to other USSTC facilities for finishing and packaging into smokeless tobacco products. Cure bins may need to be staged for shipping in the staging area. Cures continue to emit a small amount of VOC as they are removed from the cure rooms. A process flow diagram for Emission Unit 04 (104) Curing Process is provided as **Figure 6**.



Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007B Manufacturing or Processing Operations Section B.1: Process Information Section B.2: Materials and Fuel Information Section B.3: Notes, Comments, and Explanations	Additional Documentation ☐ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG. ☐ Attach a flow diagram ☐ Attach SDS
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Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21- _____

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: April 2025

Section B.1: Process Information										
Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process Continuous or Batch?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
04 (104)	Curing Process	see process description	04-AE-01 04-F-02 04-F-03	Cure Room, 4 Turning Stations (Cure Bin Dumper, Lump Breaker & Conveyors), and a Staging Area			2015	Batch		

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
04 (104)	Curing Process	Moist Tobacco in Cure Rooms	1,400	Cure Spaces		Cured Tobacco	30	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Moist Tobacco in Cure Turning	30	tons/hr combined											

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007N Source Emissions Profile __ Section N.1: Emission Summary __ Section N.2: Stack Information __ Section N.3: Fugitive Information __ Section N.4: Notes, Comments, and Explanations	Additional Documentation __ Complete DEP7007AI
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Source Name:	U.S. Smokeless Tobacco Company - Eagle One Facility
KY EIS (AFS) #:	21-
Permit #:	V-20-002
Agency Interest (AI) ID:	121768
Date:	April 2025

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
04 (104)	Curing Process	04-AE-01	Cure Room, (Cure Bin Dumper, 5 Turning Stations Lump Breaker & Conveyors), and a Staging Area			04-AE-01	3.42	VOC	4.093	Engr. Est.			14.01	14.01	61.35	61.35
		04-F-02				04-F-02	3.42	NOx	3.286	Engr. Est.			11.25	11.25	49.25	49.25
		04-F-03				04-F-03	3.42	CO	0.079	Engr. Est.			0.27	0.27	1.19	1.19
							3.42	Acetaldehyde	0.003	Engr. Est.			0.01	0.01	0.04	0.04
							3.42	Formaldehyde	0.011	Engr. Est.			0.04	0.04	0.16	0.16
							3.42	Total HAPs	0.013	Engr. Est.			0.05	0.05	0.20	0.20
				oxidizer	TO0401		3.42	NH3	5.938	Engr. Est.	20%	98%	4.06	0.08	17.80	0.36
				uncaptured	uncaptured		3.42	NH3	5.938	Engr. Est.	80%		16.26	16.26	71.20	71.20

Section N.2: Stack Information									
UTM Zone:									
Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (° F)	Exit Velocity (ft/sec)
04-AE-01	Process: EU04 Control: TO0401	3.75	45	0			21,300	160	32.15

Section N.3: Fugitive Information

UTM Zone:

Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)
04-F-02	Curing / Cure Turning	Process: EU04					100	35
04-F-03	Staging	Process: EU04					ambient	35

Section N.4: Notes, Comments, and Explanations

EU04 is limited in the permit to 29,976 tons per year of total tobacco. This number is used to calculate the controlled potential emissions.

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999						DEP7007GG Control Equipment					Additional Documentation ___ Complete Sections GG.1 through GG.12, as applicable ___ Attach manufacturer's specifications for each control device ___ Complete DEP7007AI					
Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility																
KY EIS (AFS) #: 21-																
Permit #: V-20-002																
Agency Interest (AI) ID: 121768																
Date: April 2025																
Section GG.1: General Information - Control Equipment																
Control Device ID #	Control Device Name	Cost	Manufacturer	Model Name/ Serial #	Date Installed	Inlet Gas Stream Data For <u>All</u> Control Devices					Inlet Gas Stream Data For Condensers, Adsorbers, Afterburners, Incinerators, Oxidizers <u>Only</u>			Equipment Operational Data For <u>All</u> Control Devices		
						Temperature (° F)	Flowrate (scfm @ 68 ° F)	Average Particle Diameter (μ m)	Particle Density (lb/ft ³) or Specific Gravity	Gas Density (lb/ft ³)	Gas Moisture Content (%)	Gas Composition	Fan Type	Pressure Drop Range (in. H ₂ O)	Pollutants Collected/ Controlled	Pollutant Removal (%)
TO0401	Regenerative thermal oxidizer	\$552,100	Durr	Ecopure RL	2015	92 F	17,410	N/A	N/A	0.075 (air)	ambinet	air with minimal VOC and ammonia	forced draft	manufacturer recommendations	Odor	N/A
															Ammonia	98% (20% capture)

Section GG.7: Afterburner/Incinerator/Oxidizer

Control Device ID #	Identify all Emission Units and Control Devices that Feed to Afterburner/Incinerator/Oxidizer	Identify Type: Afterburner, Incinerator, Oxidizer, or Other (specify)	Number of Burners	Burner Rating (BTU/hr)	Dimensions of Combustion Chamber (specify units)	Residence Time (sec)	Combustion Chamber Temperature (°F)	Type of Catalyst (if applicable)	Type of Heat Exchanger (if applicable)	Auxiliary Fuel							Composition and Quantities of Combusted Waste
										Identify Fuel Type	Higher Heating Value (MMBtu/scf)	Hourly Fuel Usage (scf/hr)	% Sulfur (Maximum)	% Sulfur (Average)	% Ash (Maximum)	% Ash (Average)	
TO0401	04 (104) Curing Process	RTO	1	3.30E+06	Diameter 14' Height 9' 8"		1,550 F (or lower if stack tested)	N/A	ceramic media	Propane	91,500 Btu/gal	36.07 gals/hr					
										Natural Gas	1,020 Btu/scf	3235 scf/hr					

DEP7007V**Applicable Requirements and Compliance Activities****Additional Documentation**

___ Complete DEP7007AI

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
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- ___ Section V.1: Emission and Operating Limitation(s)
 ___ Section V.2: Monitoring Requirements
 ___ Section V.3: Recordkeeping Requirements
 ___ Section V.4: Reporting Requirements
 ___ Section V.5: Testing Requirements
 ___ ~~Section V.6: Notes, Comments, and Explanations~~

Source Name:**Emission Unit 04 (104) Cure Process****KY EIS (AFS) #:** 21-**Permit #:****V-20-002****Agency Interest (AI) ID:****121768****Date:****April 2025****Section V.1: Emission and Operating Limitation(s)**

Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
104	Cure Process	Permit condition	Throughput			29,967 tons total tobacco/year	Monthly and 12-Month Rolling Throughput records
		Permit condition	VOC	Part of 196 tpy site-wide limit under Section D			Formulas in Section D

Section V.2: Monitoring Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
104	Cure Process	Throughput	Permit Condition	Operation	Production Records

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
104	Cure Process	Throughput	Permit Condition	Production	Production throughputs are totaled each month

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
104	Cure Process	Throughput	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
104	Cure Process	Throughput	None	None	None

Support Operations

Eagle One Facility
U.S. Smokeless Tobacco Company
Hopkinsville, KY

Unchanged Units

- ♦ Emission Unit 05 (105) Boiler 1 and Emission Unit 06 (106) Boiler 2 - Forms DEP7007A, DEP7007N, and Form DEP7007V
- ♦ Emission Unit 12 (112) Pesticide Fogging Forms - Forms DEP7007B, DEP7007N, and DEP7007V
- ♦ Emission Unit 13 (113) Emergency Fire Pump - Forms DEP7007A, DEP7007N, and DEP7007V

Support Operations Process Description

Fuel Burning Units

Support equipment at the facility includes two boilers (Emission Unit 05 and Emission Unit 06) and a diesel fire pump (Emission Unit 13).

Boilers

The boilers are 32.659 MMBtu/hr boilers (800 horsepower) that fire propane as a primary fuel and natural gas as an alternate primary fuel. The boilers supply steam to the process and provide steam for building space conditioning.

Diesel Engines

The facility has a diesel-fired emergency fire pump.

Pesticide Operations

Occasionally, pesticide fogging (Emission Unit 12) is conducted in select areas of the site to control pests that would possibly destroy the tobacco product.

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007A

Indirect Heat Exchangers and Turbines

- ___ Section A.1: General Information
___ Section A.2: Operating and Fuel Information
___ Section A.3: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI, DEP7007N,
DEP7007V, and DEP7007GG.
___ Manufacturer's specifications

Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)

Agency Interest (AI) ID: [121768](#)

Date: [25-Apr-25](#)

Section A.1: General Information

Emission Unit #	Emission Unit Name	Process ID	Process Name	Identify General Type: Indirect Heat Exchanger, Gas Turbine, or Combustion Turbine	Indirect Heat Exchanger Configuration	Manufacturer	Model No./ Serial No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	SCC Code	SCC Units	Control Device ID	Stack ID
05 (105) 06 (106)	Boiler 1 Boiler 2	05 06		Indirect Heat Exchanger		Cleaver-Brooks	CBEX-E 700-800-200ST	2015	10201002 (propane)	thousands of gallons	N/A	05-AE-01 06-AE-01
									10200602 (natural gas)	million cubic feet	N/A	05-AE-01 06-AE-01

Section A.2: Operating and Fuel Information

Emission Unit #	If multipurpose unit, identify the percentage of use by purpose				Rated Capacity Heat Input (MMBTU/hr)	Rated Capacity Power Output		Describe Operating Scenario (only if this unit will be used in different configurations)	Classify Fuel as Primary or Secondary	Identify Fuel Type: Coal, Natural Gas, Wood, Biomass, Landfill/Digester Gas, Fuel Oil # (specify 1-6), or Other	Heat Content (HHV)		Maximum Operating Hours	Ash Content (%)	Sulfur Content (%)
	Space Heat	Process Heat	Power	Emergency			(Specify units: hp, MW, or lb steam/hr)					(Specify units: Btu/lb, Btu/gal, or Btu/scf)			
105 106	20%	80%			32.659	800	hp		Primary fuel	Propane	91,500	Btu/gal	8,760	N/A	N/A
									Alternate primary fuel	Natural Gas	1,020	Btu/scf	8,760	N/A	N/A

Division for Air Quality

300 Sower Boulevard
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DEP7007N

Source Emissions Profile

- [__ Section N.1: Emission Summary](#)
[__ Section N.2: Stack Information](#)
~~Section N.3: Fugitive Information~~
~~Section N.4: Notes, Comments, and Explanations~~

Additional Documentation

__ Complete DEP7007AI

Source Name:

U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #:

21-

Permit #:

V-20-002

Agency Interest (AI) ID:

121768

Date:

25-Apr-25

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
05 (105) 06 (106)	Boiler 1 Boiler 2	05 06	Propane	N/A	N/A	05-AE-01 06-AE-01	0.357	PM, PM10, PM2.5	0.7	AP-42 Section 1.5	N/A	N/A	0.25	0.25	1.09	1.09
								SO2	0.055	AP-42 Section 1.5	N/A	N/A	0.02	0.02	0.09	0.09
								NOx	13	AP-42 Section 1.5	N/A	N/A	4.64	4.64	20.32	20.32
								CO	7.5	AP-42 Section 1.5	N/A	N/A	2.68	2.68	11.73	11.73
								VOC	0.8	AP-42 Section 1.5	N/A	N/A	0.29	0.29	1.25	1.25
								CO2e	12,570	40 CFR 98 Sub.C	N/A	N/A	4,487	4,487	19,651	19,651
05 (105) 06 (106)	Boiler 1 Boiler 2	05 06	Natural Gas	N/A	N/A	05-AE-01 06-AE-01	0.032	PM, PM10, PM2.5	13.77	Manufacturer spec	N/A	N/A	0.44	0.44	1.93	1.93
								SO2	0.61	Manufacturer spec	N/A	N/A	0.02	0.02	0.09	0.09
								NOx	35.7	Manufacturer spec	N/A	N/A	1.14	1.14	5.01	5.01
								CO	7.65	Manufacturer spec	N/A	N/A	0.24	0.24	1.07	1.07
								VOC	3.88	Manufacturer spec	N/A	N/A	0.12	0.12	0.54	0.54
								CO2e	120,307	40 CFR 98 Sub.C	N/A	N/A	3,852	3,852	16,872	16,872
05 (105) 06 (106)	Boiler 1 Boiler 2	05 06	Maximum (propane or natural gas)					PM, PM10, PM2.5					0.44	0.44	1.93	1.93
								SO2					0.02	0.02	0.09	0.09
								NOx					4.64	4.64	20.32	20.32
								CO					2.68	2.68	11.73	11.73
								VOC					0.29	0.29	1.25	1.25
								CO2e					4,487	4,487	19,651	19,651

Section N.2: Stack Information
UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (° F)	Exit Velocity (ft/sec)
05-AE-01	Boiler 1 05 (105)	2	43	0			10,294	414	54.61
06-AE-01	Boiler 2 06 (106)	2	43	0			10,294	414	54.61

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities ☐ Section V.1: Emission and Operating Limitation(s) ☐ Section V.2: Monitoring Requirements ☐ Section V.3: Recordkeeping Requirements ☐ Section V.4: Reporting Requirements ☐ Section V.5: Testing Requirements ☒ Section V.6: Notes, Comments, and Explanations	Additional Documentation ☐ Complete DEP7007AI
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Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21- _____

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: 25-Apr-25

Section V.1: Emission and Operating Limitation(s)							
Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
05 (105) 06 (106)	Boiler 1 Boiler 2	59:015 Section 4(1)(c)	PM	0.36 lb/MMBtu			Emission factor and maximum rated capacity of equipment
		59:015 Section 4(2)	Opacity	20%, except one 6-min period of 40% in one hour			N/A
		59:015 Section 5(1)(c)	SO2	1.39 lb/MMBtu			Emission factor and maximum rated capacity of equipment
		59:015, Section 7(1)				Startup and Shutdown	Follow manufacturer's procedures
		Exempt from 40 CFR 63 Subpart JJJJJJ	N/A	N/A			Meet definition of gas-fired boiler in 40 CFR 63.11237
		Permit condition	VOC	Part of 196 tpy site-wide limit under Section D			Formulas in Section D

Section V.2: Monitoring Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
05 (105) 06 (106)	Boiler 1 Boiler 2		52:020, Section 10	Fuel Usage of Propane and Natural Gas	Monitor the type and amount of fuel combusted (in Mgal for propane and in MMscf for natural gas) on a monthly basis

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
05 (105) 06 (106)	Boiler 1 Boiler 2		52:020, Section 10 and 40 CFR 60.48c(g)	Fuel Usage of Propane and Natural Gas	Keep records of the type and amount of fuel combusted (in Mgal for propane and in MMscf for natural gas) on a monthly basis
				Startup and Shutdown	Keep records of manufacturer's procedures

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
05 (105) 06 (106)	Boiler 1 Boiler 2	PM Opacity SO2	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
05 (105) 06 (106)	Boiler 1 Boiler 2	PM Opacity SO2	N/A	N/A	N/A

Division for Air Quality

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DEP7007B

Manufacturing or Processing Operations

- ☐ Section B.1: Process Information
☐ Section B.2: Materials and Fuel Information
☒ Section B.3: Notes, Comments, and Explanations

Additional Documentation

- ☐ Complete DEP7007AI, DEP7007N,
DEP7007V, and DEP7007GG.
☐ Attach a flow diagram
☐ Attach SDS

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

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Agency Interest (AI) ID: 121768

Date: 25-Apr-25

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process <u>Continuous</u> or <u>Batch</u> ?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
12 (112)	Pesticide Fogging	Pesticide Foggers in 3 processing buildings	12	Pesticide Fogging	N/A	N/A	2015	Batch	7.5 gal/hr of pesticide, 8 hrs/day, 1 day/wk, 24 wk/yr in each of 3 buildings (576 hr/yr maximum total operating time and 4,320 gal/yr maximum total pesticide use)	

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
12 (112)	Pesticide Fogging	Pesticide (Vectrin 3%)	7.5	gal/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999						DEP7007N Source Emissions Profile ___ Section N.1: Emission Summary ___ Section N.2: Stack Information ___ Section N.3: Fugitive Information ___ Section N.4: Notes, Comments, and Explanations								Additional Documentation ___ Complete DEP7007AI			
Source Name:						U.S. Smokeless Tobacco Company - Eagle One Facility											
KY EIS (AFS) #:						21-											
Permit #:						V-20-002											
Agency Interest (AI) ID:						121768											
Date:						25-Apr-25											
N.1: Emission Summary																	
Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions		
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)	
12 (112)	Pesticide Fogging	12	Pesticide Fogging	N/A	N/A	12-AE-01	7.5	VOC	0.253	MSDS	N/A	N/A	1.90	1.90	8.31	0.55	

Section N.3: Fugitive Information**UTM Zone:**

Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)
112	Pesticide Fogging	12-F-1					75	20

Section N.4: Notes, Comments, and Explanations

EU12 is limited in the permit to 4,320 gallons per year of pesticide. This number is used to calculate the controlled potential emissions.

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities <u> </u> Section V.1: Emission and Operating Limitation(s) <u> </u> Section V.2: Monitoring Requirements <u> </u> Section V.3: Recordkeeping Requirements <u> </u> Section V.4: Reporting Requirements <u> </u> Section V.5: Testing Requirements <u> </u> Section V.6: Notes, Comments, and Explanations	Additional Documentation <u> </u> Complete DEP7007AI					
Source Name: <u>U.S. Smokeless Tobacco Company - Eagle One Facility</u> KY EIS (AFS) #: <u>21-</u> Permit #: <u>V-20-002</u> Agency Interest (AI) ID: <u>121768</u> Date: <u>25-Apr-25</u>							
Section V.1: Emission and Operating Limitation(s)							
Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
12 (112)	Pesticide Fogging	Permit condition	VOC	N/A	N/A	576 hours/yr and 4,320 gals/yr	Monthly and 12-month rolling throughput records
		Permit condition	VOC	Part of 196 tpy site-wide limit under Section D			Formulas in Section D

Section V.2: Monitoring Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
12 (112)	Pesticide Fogging	VOC	Permit condition	Hours of operation and Pesticide usage	Throughput (usage) records

Section V.3: Recordkeeping Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
12 (112)	Pesticide Fogging	VOC	Permit condition	Hours of operation and Pesticide usage	Throughput (usage) records

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
12 (112)	Pesticide Fogging	VOC	Permit condition	Exceedance of Hours of operation or Pesticide usage	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
12 (112)	Pesticide Fogging	VOC	N/A	N/A	N/A

Division for Air Quality

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DEP7007EE

Internal Combustion Engines

- ☐ Section EE.1: General Information
☐ Section EE.2: Operating Information
☐ Section EE.3: Design Information
☐ Section EE.4: Fuel Information
☐ Section EE.5: Emission Factor Information
☒ ~~Section EE.6: Notes, Comments, and Explanations~~

Additional Documentation

☐ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG

☐ Attach EPA certification of the engine

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: 25-Apr-25

Section EE.1: General Information

Emission Unit #	Emission Unit Name	Control Device ID	Stack ID	Manufacturer	Model Number	Model Year	Date of Manufacture	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Date Reconstructed/Modified	List Applicable Regulations
13 (113)	Emergency Fire Pump	N/A	13-AE-01	Clarke	JU6H-UFADR9			2015	N/A	40 CFR 60 Subpart IIII, 40 CFR 63 Subpart ZZZZ

Section EE.2: Operating Information					
Emission Unit #	Engine Purpose (Identify if Non-Emergency, Emergency, Fire/Water Pump, Black-start engine for combustion turbine, Engine Testing)	Hours Operated	Is this engine a rental? <i>(Yes/No)</i>	Rental Time Period <i>(hrs)</i>	Alternate Operating Scenarios (Describe any operating scenarios in which the engine may be used in a different configuration)
13 (113)	Emergency (Fire Pump)	500 hr/yr (maximum)	No	N/A	N/A

Section EE.3: Design Information							
Emission Unit #	Engine Type (Identify all that apply: Commercial, Institutional, Stationary, Non-Road)	Ignition Type (Identify if either Compression or Spark Ignition)	Engine Family (Identify all that apply: 2-stroke, 4-stroke, Rich Burn, Lean Burn)	Maximum Engine Power (bhp)	Maximum Engine Speed (rpm)	Total Displacement (L)	Number of Cylinders
13 (113)	Non-Road	Compression Ignition	4-stroke	250	1760	415	6

Section EE.4: Fuel Information

Emission Unit #	Identify if Primary, Secondary, or Tertiary Fuel	Fuel Type (Identify if Diesel, Gasoline, Natural Gas, Liquefied Petroleum Gas (LPG), Landfill/Digester Gas, or Other)	Fuel Grade	Percent Time Used (%)	Maximum Fuel Consumption	Heat Content	Sulfur Content (%)	SCC Code	SCC Units
13 (113)	Primary	Diesel	N/A	100%	12.3 gal/hr	138,000 Btu/gal	0.0015%	20100107	Thousands of gallons

Section EE.5: Emission Factor Information

Emission factors expressed here are based on the potential to emit.

Emission Unit #	Fuel	Pollutant	Emission Factor	Emission Factor Units	Source of Emission Factor
13 (113)	Diesel	PM	2.34	lb / 1000 gal	Manufacturer estimate
		SO ₂	0.21	lb / 1000 gal	AP-42 Section 1.3
		NO _x	120.29	lb / 1000 gal	Manufacturer estimate
		CO	20.05	lb / 1000 gal	Manufacturer estimate
		VOC	3.34	lb / 1000 gal	Manufacturer estimate
		CO ₂ e	22,579	lb / 1000 gal	40 CFR 98 Subpart C

Division for Air Quality

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DEP7007N

Source Emissions Profile

- [__ Section N.1: Emission Summary](#)
[__ Section N.2: Stack Information](#)
~~[__ Section N.3: Fugitive Information](#)~~
[__ Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

__ Complete DEP7007AI

Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)

Agency Interest (AI) ID: [121768](#)

Date: [25-Apr-25](#)

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
13 (113)	Emergency Fire Pump	13	Fire Pump	N/A	N/A	13-AE-01	0.0123	PM	2.34	Manufacturer estimate	N/A	N/A	0.029	0.029	0.126	0.007
								SO2	0.21	AP-42 Section 1.3	N/A	N/A	0.003	0.003	0.011	0.001
								NOx	120.29	Manufacturer estimate	N/A	N/A	1.48	1.48	6.481	0.37
								CO	20.05	Manufacturer estimate	N/A	N/A	0.25	0.25	1.080	0.06
								VOC	3.34	Manufacturer estimate	N/A	N/A	0.04	0.04	0.180	0.01
								CO2e	22,579	40 CFR 98 Subpart C	N/A	N/A	277.7	277.7	1,216.4	69.4

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (° F)	Exit Velocity (ft/sec)
13-AE-01	13 (113)	0.5	8.5				1400	961	119

Section N.4: Notes, Comments, and Explanations

EU13 is limited to 500 hours per year of operation to calculate the controlled potential emissions.

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities ___ Section V.1: Emission and Operating Limitation(s) ___ Section V.2: Monitoring Requireme ___ Section V.3: Recordkeeping Requir ___ Section V.4: Reporting Requiremen ___ Section V.5: Testing Requirements ___ Section V.6: Notes, Comments, and Explanations	Additional Documentation ___ Complete DEP7007AI																																								
Source Name: <u>U.S. Smokeless Tobacco Company - Eagle One Facility</u> KY EIS (AFS) 21- _____ Permit #: <u>V-20-002</u> Agency Interest (AI) ID: <u>121768</u> Date: <u>25-Apr-25</u>																																										
Section V.1: Emission and Operating Limitation(s) <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <thead> <tr> <th style="width: 10%;">Emission Unit #</th> <th style="width: 15%;">Emission Unit Description</th> <th style="width: 15%;">Applicable Regulation or Requirement</th> <th style="width: 10%;">Pollutant</th> <th style="width: 10%;">Emission Limit (if applicable)</th> <th style="width: 10%;">Voluntary Emission Limit or Exemption (if applicable)</th> <th style="width: 15%;">Operating Requirement or Limitation (if applicable)</th> <th style="width: 25%;">Method of Determining Compliance with the Emission and Operating Requirement(s)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">13 (113)</td> <td style="text-align: center;">Emergency Fire Pump</td> <td>40 CFR 60.4205(c) 40 CFR 60.4205(c) 40 CFR 60.4207(b)</td> <td style="text-align: center;">NOx + HC PM SO2</td> <td style="text-align: center;">4.0 g/kW-hr 0.20 g/kW-hr 15 ppm fuel S</td> <td style="text-align: center;">N/A</td> <td style="text-align: center;">N/A</td> <td>Manufacturers certificate Fuel certificates</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">40 CFR 63.6590(c)</td> <td style="text-align: center;">N/A</td> <td style="text-align: center;">N/A</td> <td style="text-align: center;">N/A</td> <td>Meet the 40 CFR 63 Subpart ZZZZ requirements by meeting the applicable requirements of 40 CFR 60 Subpart IIII.</td> <td>Because the engine meets the criteria in 63.6590(c)(1), no further requirements in 40 CFR 63 Subpart ZZZZ are applicable.</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">40 CFR 60.4211(a)</td> <td style="text-align: center;">N/A</td> <td style="text-align: center;">N/A</td> <td style="text-align: center;">N/A</td> <td>Operate and maintain engine according to manufacturer specifications</td> <td>Maintenance records</td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">40 CFR 60.4211(f)</td> <td style="text-align: center;">N/A</td> <td style="text-align: center;">N/A</td> <td style="text-align: center;">N/A</td> <td>100 hours/CY for maintenance and readiness testing. 50 hrs/CY non-emergency use</td> <td>Non-resettable hour meter, records of operating hours and reason for operation</td> </tr> </tbody> </table>			Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)	13 (113)	Emergency Fire Pump	40 CFR 60.4205(c) 40 CFR 60.4205(c) 40 CFR 60.4207(b)	NOx + HC PM SO2	4.0 g/kW-hr 0.20 g/kW-hr 15 ppm fuel S	N/A	N/A	Manufacturers certificate Fuel certificates			40 CFR 63.6590(c)	N/A	N/A	N/A	Meet the 40 CFR 63 Subpart ZZZZ requirements by meeting the applicable requirements of 40 CFR 60 Subpart IIII.	Because the engine meets the criteria in 63.6590(c)(1), no further requirements in 40 CFR 63 Subpart ZZZZ are applicable.			40 CFR 60.4211(a)	N/A	N/A	N/A	Operate and maintain engine according to manufacturer specifications	Maintenance records			40 CFR 60.4211(f)	N/A	N/A	N/A	100 hours/CY for maintenance and readiness testing. 50 hrs/CY non-emergency use	Non-resettable hour meter, records of operating hours and reason for operation
Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)																																			
13 (113)	Emergency Fire Pump	40 CFR 60.4205(c) 40 CFR 60.4205(c) 40 CFR 60.4207(b)	NOx + HC PM SO2	4.0 g/kW-hr 0.20 g/kW-hr 15 ppm fuel S	N/A	N/A	Manufacturers certificate Fuel certificates																																			
		40 CFR 63.6590(c)	N/A	N/A	N/A	Meet the 40 CFR 63 Subpart ZZZZ requirements by meeting the applicable requirements of 40 CFR 60 Subpart IIII.	Because the engine meets the criteria in 63.6590(c)(1), no further requirements in 40 CFR 63 Subpart ZZZZ are applicable.																																			
		40 CFR 60.4211(a)	N/A	N/A	N/A	Operate and maintain engine according to manufacturer specifications	Maintenance records																																			
		40 CFR 60.4211(f)	N/A	N/A	N/A	100 hours/CY for maintenance and readiness testing. 50 hrs/CY non-emergency use	Non-resettable hour meter, records of operating hours and reason for operation																																			

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
13 (113)	Emergency Fire Pump	NOx + HC PM	40 CFR 60.4211(c)	N/A	Purchase a certified engine and install and configure engine in accordance with manufacturer's emission-related specifications.
		SO2	Permit Condition	N/A	Maintain fuel supplier certifications indicating sulfur content of purchased fuel.
		N/A	40 CFR 60.4211(a)	N/A	Operate and maintain engine in accordance with manufacturer's emission-related instructions and change only those emission-related settings that are permitted by the manufacturer.
		N/A	40 CFR 60.4214(b)	Operating hours	Maintain records of engine operating hours and reason for operation.

Section V.3: Recordkeeping Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
13 (113)	Emergency Fire Pump	NOx + HC PM	40 CFR 60.4211(c)	Emission certificate	Emission certificate from engine manufacturer
		SO2	Permit Condition	Diesel sulfur content	Diesel certificates from fuel supplier showing sulfur content
		N/A	40 CFR 60.4211(a)	Engine maintenance	Engine maintenance records
		N/A	40 CFR 60.4214(b)	Operating hours	Records of operating hours and reason for operation

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
13 (113)	Emergency Fire Pump	NOx + HC PM	N/A	N/A	N/A
		SO2	N/A	N/A	N/A
		N/A	N/A	N/A	N/A
		N/A	Permit condition	Operating hour exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
13 (113)	Emergency Fire Pump	NOx + HC PM SO2	N/A	N/A	N/A
13 (113)	Emergency Fire Pump	N/A	N/A	N/A	N/A
13 (113)	Emergency Fire Pump	N/A	N/A	N/A	N/A

Tobacco Finishing

Eagle One Facility
U.S. Smokeless Tobacco Company
Hopkinsville, KY

This Unit includes the installation of new equipment

- ♦ Emission Unit 14 (114): Tobacco Finishing Process – Process Description, Process Flow Diagram, and Forms DEP7007B, DEP7007N, and DEP7007V

Tobacco Finishing Process Description

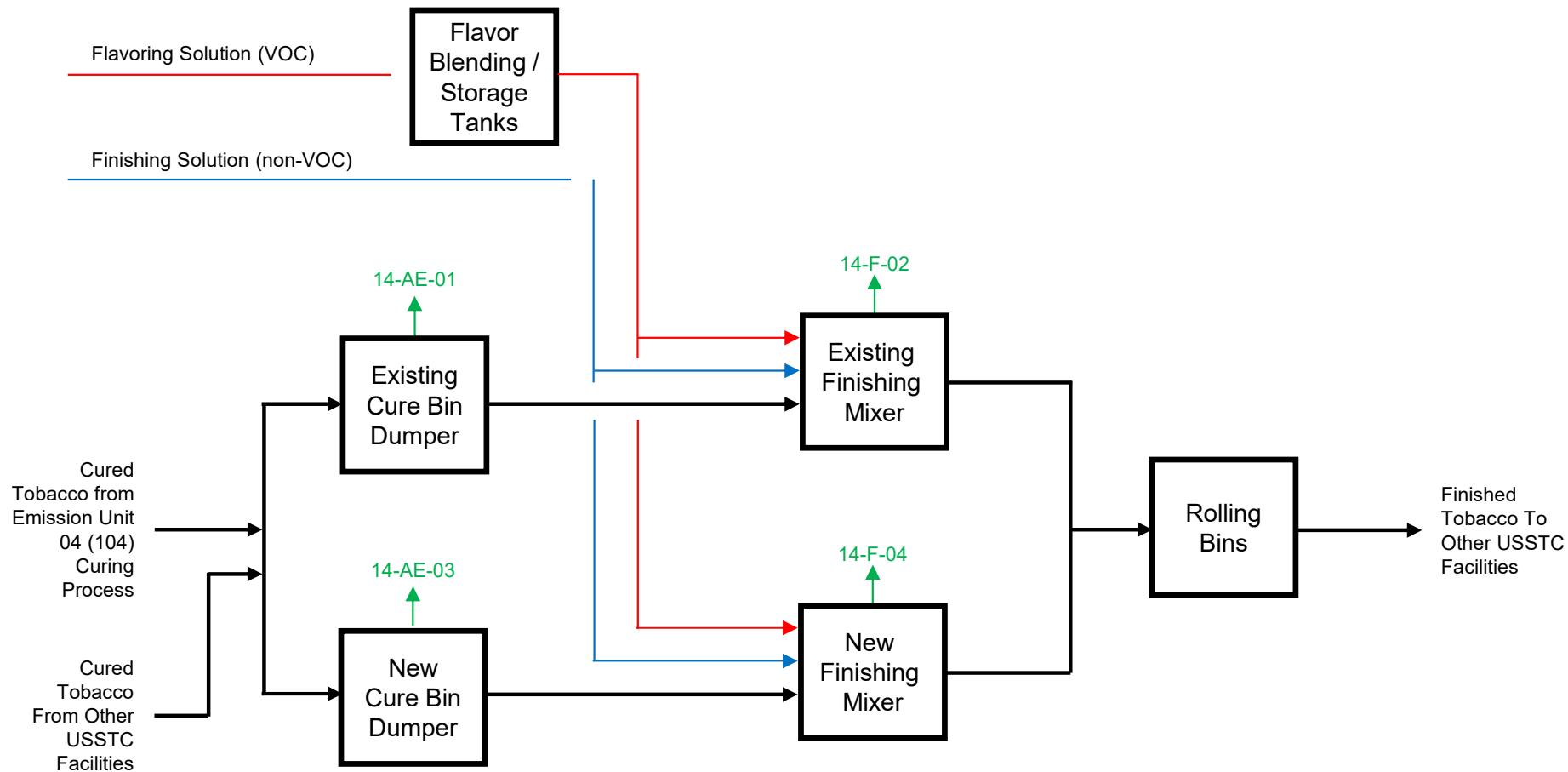
Tobacco Finishing will consist of Emission Unit 14 (114) Tobacco Finishing Process, described below.

EMISSION UNIT 14 (114) TOBACCO FINISHING PROCESS

The Tobacco Finishing Process involves mixing cured tobacco with a finishing solution and a flavor solution in a finishing mixer. Cured tobacco enters this process from Emission Unit 04 (101) Dry Flour Casing and Cutting or from other USSTC facilities.

The Tobacco Finishing Process consists of an existing cure bin dumper, an existing finishing mixer and the addition of a new (2025) cure bin dumper and new finishing mixer requested with this application, and related process tanks. The finishing process involves applying finishing solution that typically includes VOC-based flavor (ethanol VOC) to the cured tobacco to produce a final moist snuff product. VOC emissions from the finishing operation are comprised of a portion of the ethanol applied and a small amount of non-ethanol VOC.

Finished tobacco is shipped to other USSTC facilities for packaging into smokeless tobacco products. A process flow diagram for Emission Unit 14 (114) Tobacco Finishing Process is provided as **Figure 7**.



Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007B

Manufacturing or Processing Operations

Section B.1: Process InformationSection B.2: Materials and Fuel Information~~Section B.3: Notes, Comments, and Explanations~~

Additional Documentation

☐ Complete DEP7007AI,
DEP7007N, DEP7007V, and
DEP7007GG.

☐ Attach a flow diagram

☐ Attach SDS

Source Name:

U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #:

21-

Permit #:

V-20-002

Agency Interest (AI) ID:

121768

Date:

April 2025

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process Continuous or Batch?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
14 (114)	Tobacco Finishing Process	see process description	14-AE-01 14-AE-03	Cure Bin Dumpers			August 2017	Batch		
			14-F-02 14-F-04	Finishing Mixers - Custom Designed and Built			Mixer 1 - August 2017 Mixer - TBD	Batch		
			included above	One or more blending/storage tanks for finishing flavor solution			August 2017	Batch		

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
14 (114)	Tobacco Finishing Process	Cured Tobacco	7.64	tons/hr	10	Finished Tobacco	10	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		VOC Finishing Solution (ethanol)	46.6	lbs/hr											

Division for Air Quality

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Frankfort, KY 40601
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DEP7007N

Source Emissions Profile

[_ Section N.1: Emission Summary](#)[_ Section N.2: Stack Information](#)[_ Section N.3: Fugitive Informatio](#)[_ Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

[___ Complete DEP7007AI](#)Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)Agency Interest (AI) ID: [121768](#)Date: [April 2025](#)

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
14 (114)	Tobacco Finishing Process	14-AE-01 14-AE-03	Cure Bin Dumpers			14-AE-01 14-AE-03	10.0	VOC	3.235	Engr. Est.			32.35	32.35	141.7	63.24
		14-F-02 14-F-04	Finishing Mixers			14-F-02 14-F-04	included above	included above	included above	included above			included above	included above	included above	included above
		included above	One or more blending/storage tanks for finishing flavor solution			included above	included above	included above	included above	included above			included above	included above	included above	included above
		included above	Rolling Bins			included above	included above	included above	included above	included above			included above	included above	included above	included above

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (° F)	Exit Velocity (ft/sec)
14-AE-01	Cure Bin Dumper								
14-AE-03	Cure Bin Dumper								

Section N.3: Fugitive Information**UTM Zone:**

Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)
14 (114)	Tobacco Finishing Process	14-F-02						
		14-F-04						

Section N.4: Notes, Comments, and Explanations

EU014 is limited in the permit to 39,100 tons per year of total tobacco. This number is used to calculate the controlled potential emissions.

DEP7007V

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

Applicable Requirements and Compliance Activities

- ☐ Section V.1: Emission and Operating Limitation(s)
☐ Section V.2: Monitoring Requirements
☐ Section V.3: Recordkeeping Requirements
☐ Section V.4: Reporting Requirements
☐ Section V.5: Testing Requirements
☒ Section V.6: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: April 2025

Section V.1: Emission and Operating Limitation(s)

Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
114	Finishing Process	Permit condition	Throughput			39,100 tons total tobacco/year	Monthly and 12-Month Rolling Throughput records
		Permit condition	VOC	Part of 196 tpy site-wide limit under Section D			Formulas in Section D

Section V.2: Monitoring Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
114	Finishing Process	Throughput	Permit Condition	Operation	Production Records

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
114	Finishing Process	Throughput	Permit Condition	Production	Production throughputs are totaled each month

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
114	Finishing Process	Throughput	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
114	Finishing Process	Throughput	None	None	None

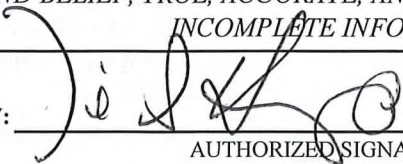
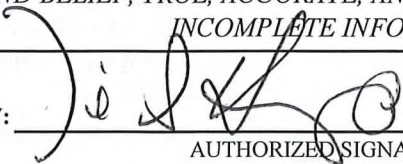
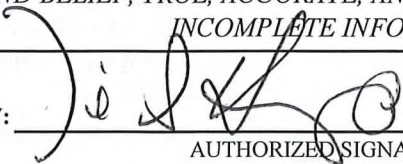
CAM Applicability

The compliance assurance monitoring (CAM) rule, 40 CFR Part 64, applies on a pollutant-specific basis to emission units that rely on air pollution control equipment to achieve compliance with applicable standards. A CAM applicability assessment has been completed for the Eagle One Facility to identify if any emission units are subject to these provisions. In accordance with §64.2(a) of the rule, CAM requirements apply if:

- The unit is subject to an emission limitation or standard for a regulated air pollutant (or surrogate of the regulated pollutant).
- A control device is used by the emission unit to achieve compliance with the emission limitation or standard.
- Pre-control device potential emissions of the regulated air pollutant are equal to or greater than 100 percent of the major source threshold (in tons per year).
- The unit is not otherwise exempt in accordance with §64.2(b) of the CAM rule.

As shown in the table below, no emission units at the Eagle One Facility are subject to CAM requirements based on pre-control device (uncontrolled) potential emissions being below major source threshold levels. Consequently, a CAM plan is not required as part of this Title renewal application for the Eagle One Facility.

Emission Unit Ref. No.	Equipment Ref. No.	Equipment	Control Device Ref. No.	PM/PM10 Emission Estimates			CAM Applicable?
				Throughput (tons/yr)	Emission Factor (lbs/ton)	Pre-control Emissions (tons/yr)	
Emission Unit 01 (101) Dry Flour Casing and Cutting Process	BH0101	Global Dust Collector (Stem Dumper and Shaker)	BH0101	21,900	1.714	18.8	No
	BH0102	Global Dust Collector (Lamina Feeder)	BH0102	22,482	1.286	14.5	No
	BH0103	Global Dust Collector (Hogshead Picker, Sorters and Conveyors)	BH0103	22,482	2.143	24.1	No
	CF0101 - CF0104	Cutters	BH0104 - BH0107	22,482	0.131	1.5	No
Emission Unit 02 (102A) Dry Flour Drying Process A	DF0201	Fluidized Bed Dryer	CY0201	11,241	4	22.5	No
	BH0201	Fluidize Bed Dryer Dust Return	BH0201	11,241	0.429	2.4	No
	BH0202	Global Dust Collector (Conveyors, Sifting, Tote Filling, and Surge Silo)	BH0202	11,241	1.371	7.7	No
	TP0201	Truck Filling	BH0204	11,241	0.513	2.9	No
Emission Unit 02 (102B) Dry Flour Drying Process B	DA0201	DLL Dryer	CY0202	11,241	1	5.6	No
	BH0205	Global Dust Collector (Conveyors, Sifting, Tote Filling, and Surge Silo)	BH0205	11,241	1.371	7.7	No
	TP0202	Truck Filling	BH0207	11,241	0.513	2.9	No

Division for Air Quality Submit to the Regional Office identified in your	DEP7007CC Compliance Certification <u>Section CC.1: Source Information</u> <u>Section CC.2: Signature Block</u> <u>Section CC.3: Identification of Emission Units & Each Term or Condition of the Permit</u> Section CC.4: Notes, Comments, and Explanations															
Section CC.1: Source Information																
1) Source Name U.S. Smokeless Tobacco Company	2) Agency Interest (AI) ID 121768															
3) Source Location Address (street, city, state, zip) 100 Weyman's Way, Hopkinsville, KY 42240																
4) Technical Contact (name, e-mail, phone #) Maurice Chemweno																
5) Permit Number(s) V-20-002	6) County Christian	7) KY EIS (AFS) # 21-														
8) Submittal Information Are you certifying any requirement(s) as "not in continuous compliance?" ☐ Yes ☒ No What is the reporting period? <table style="display: inline-table; border-collapse: collapse;"> <tr> <td style="text-align: center;">01</td> <td style="text-align: center;">01</td> <td style="text-align: center;">24</td> <td style="text-align: center;">TO</td> <td style="text-align: center;">04</td> <td style="text-align: center;">30</td> <td style="text-align: center;">25</td> </tr> <tr> <td style="text-align: center;">mm/</td> <td style="text-align: center;">dd/</td> <td style="text-align: center;">yy</td> <td></td> <td style="text-align: center;">mm/</td> <td style="text-align: center;">dd/</td> <td style="text-align: center;">yy</td> </tr> </table>			01	01	24	TO	04	30	25	mm/	dd/	yy		mm/	dd/	yy
01	01	24	TO	04	30	25										
mm/	dd/	yy		mm/	dd/	yy										
Section CC.2: Signature Block																
9) CERTIFICATION SIGNATURE I, THE UNDERSIGNED, HEREBY CERTIFY UNDER PENALTY OF LAW, THAT I AM A RESPONSIBLE OFFICIAL, AND THAT I HAVE PERSONALLY EXAMINED, AND AM FAMILIAR WITH, THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ITS ATTACHMENTS. BASED ON MY INQUIRY OF THOSE INDIVIDUALS WITH PRIMARY RESPONSIBILITY FOR OBTAINING THE INFORMATION, I CERTIFY THAT THE STATEMENTS AND INFORMATION IS ON KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE OR INCOMPLETE INFORMATION, INCLUDING THE POSSIBILITY OF FINE OR IMPRISONMENT.																
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: bottom;"> BY:  _____ AUTHORIZED SIGNATURE Daniel Heltsley _____ TYPED OR PRINTED NAME OF SIGNATORY </td> <td style="width: 50%; vertical-align: bottom;"> 5/9/25 _____ DATE Sr. Director Plant Operations Hopkinsville _____ TITLE OF SIGNATORY </td> </tr> </table>			BY:  _____ AUTHORIZED SIGNATURE Daniel Heltsley _____ TYPED OR PRINTED NAME OF SIGNATORY	5/9/25 _____ DATE Sr. Director Plant Operations Hopkinsville _____ TITLE OF SIGNATORY												
BY:  _____ AUTHORIZED SIGNATURE Daniel Heltsley _____ TYPED OR PRINTED NAME OF SIGNATORY	5/9/25 _____ DATE Sr. Director Plant Operations Hopkinsville _____ TITLE OF SIGNATORY															

Section CC.3: Identification of Emission Units & Each Term or Condition of the Permit***Emission Units in Continuous Compliance***

10a) Emission Units in Continuous Compliance. *The following emission units were in continuous compliance with each permit term or condition(s) and applicable requirements listed here, such as emission standards, emission control requirements, emission testing, court requirements, work practices, or enhanced monitoring, based on the compliance methods specified below. If additional space is required, reproduce this page as needed.*

Emission Unit/Permit ID#	Permit Term, Condition, or Applicable Regulation	Emission Unit Description	Permit Limit or requirement	Actual Emissions or status of requirement	The method used for determining compliance over the reporting period, and whether the method provided continuous or intermittent data. (such as test methods, monitoring procedures, recordkeeping and reporting)
All	All	Site-wide	Yes	In Compliance	Applicable Monitoring, Recordkeeping and Reporting

Section CC.3: Identification of Emission Units & Each Term or Condition of the Permit***Emission Units Subject to Future Compliance Dates***

10b) Emission Units Subject to Future Compliance Dates. *The following emission units will achieve compliance on a timely basis and maintain compliance with future compliance dates as they become applicable during the permit term. If additional space is required, reproduce this page as needed.*

Emission Unit/Permit ID#	Future Compliance Schedule	Emission Unit Description	Reason for Future Compliance Date
None Identified			

Section CC.3: Identification of Emission Units & Each Term or Condition of the Permit***Emission Units Not in Continuous Compliance***

10c)(1) Emission Units Not in Continuous Compliance. *The following emission units were not in continuous compliance with each permit term or condition and applicable requirements listed here, such as emission standards, emission control requirements, emission testing, court requirements, work practices, or enhanced monitoring, based on the compliance methods specified below. If additional space is required, reproduce this page as needed.*

Emission Unit/Permit ID#	Permit Term, Condition, or Applicable Regulation	Emission Unit Description	Permit Limit or Requirement	Actual Emissions or Status of Requirement	The method used for determining compliance over the reporting period, and whether compliance was continuous or intermittent. (such as test methods, monitoring procedures, recordkeeping and reporting)
None					

10c)(2) Emission Units Not in Continuous Compliance. *For the emission units and requirements listed in 10c)(1) that were not in continuous compliance since the last reporting period, state the duration, magnitude, and reason or reasons for non-compliance. Each row of 10c)(2) must relate to the corresponding row of 10c)(1). If additional space is required, reproduce this page as needed.*

Emission Unit/Permit ID#	Description of duration, magnitude, and reason(s) for non-compliance and corrective steps taken or planned.
N/A	

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

DEP7007DD

Insignificant Activities

[___ Section DD.1: Table of Insignificant Activities](#)

[___ Section DD.2: Signature Block](#)

[___ ~~Section DD.3: Notes, Comments, and Explanations~~](#)

Source Name:

[U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #:

21-

Permit #:

[V-20-002](#)

Agency Interest (AI) ID:

[121768](#)

Date:

[25-Apr-25](#)

Section DD.1: Table of Insignificant Activities

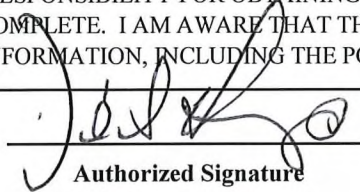
*Identify each activity with a unique Insignificant Activity number (IA #); for example: 1, 2, 3... etc.

Insignificant Activity #	Description of Activity including Rated Capacity	Serial Number or Other Unique Identifier	Applicable Regulation(s)	Calculated Emissions
1	Pressurized propane tanks		None	
2	Small parts cleaners		None	
3	Laboratory fume hoods for physical/chemical analyses		None	
4	Cure Room Heater (1.8 MMBtu/hr natural gas combustion)		None	
5	Cure Bin Washing Operation		None	
6	Rolling Bin Washing Operation		None	

Section DD.2: Signature Block

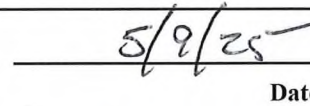
I, THE UNDERSIGNED, HEREBY CERTIFY UNDER PENALTY OF LAW, THAT I AM A RESPONSIBLE OFFICIAL, AND THAT I HAVE PERSONALLY EXAMINED, AND AM FAMILIAR WITH, THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ITS ATTACHMENTS. BASED ON MY INQUIRY OF THOSE INDIVIDUALS WITH PRIMARY RESPONSIBILITY FOR OBTAINING THE INFORMATION, I CERTIFY THAT THE INFORMATION IS ON KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE OR INCOMPLETE INFORMATION, INCLUDING THE POSSIBILITY OF FINE OR IMPRISONMENT.

By:


Authorized Signature

Daniel Heltsley

Type/Print Name of Signatory


Date

Sr. Director Plant Operations Hopkinsville

Title of Signatory



Synthetic Minor / Title V Permit Renewal / Modification Application

**U.S. Smokeless Tobacco Company
Eagle One Facility
Hopkinsville, KY**

**May 2025
(revised May 2026)**

Application Prepared by:

**Altria Client Services LLC
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Richmond, Virginia 23234**

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Introduction

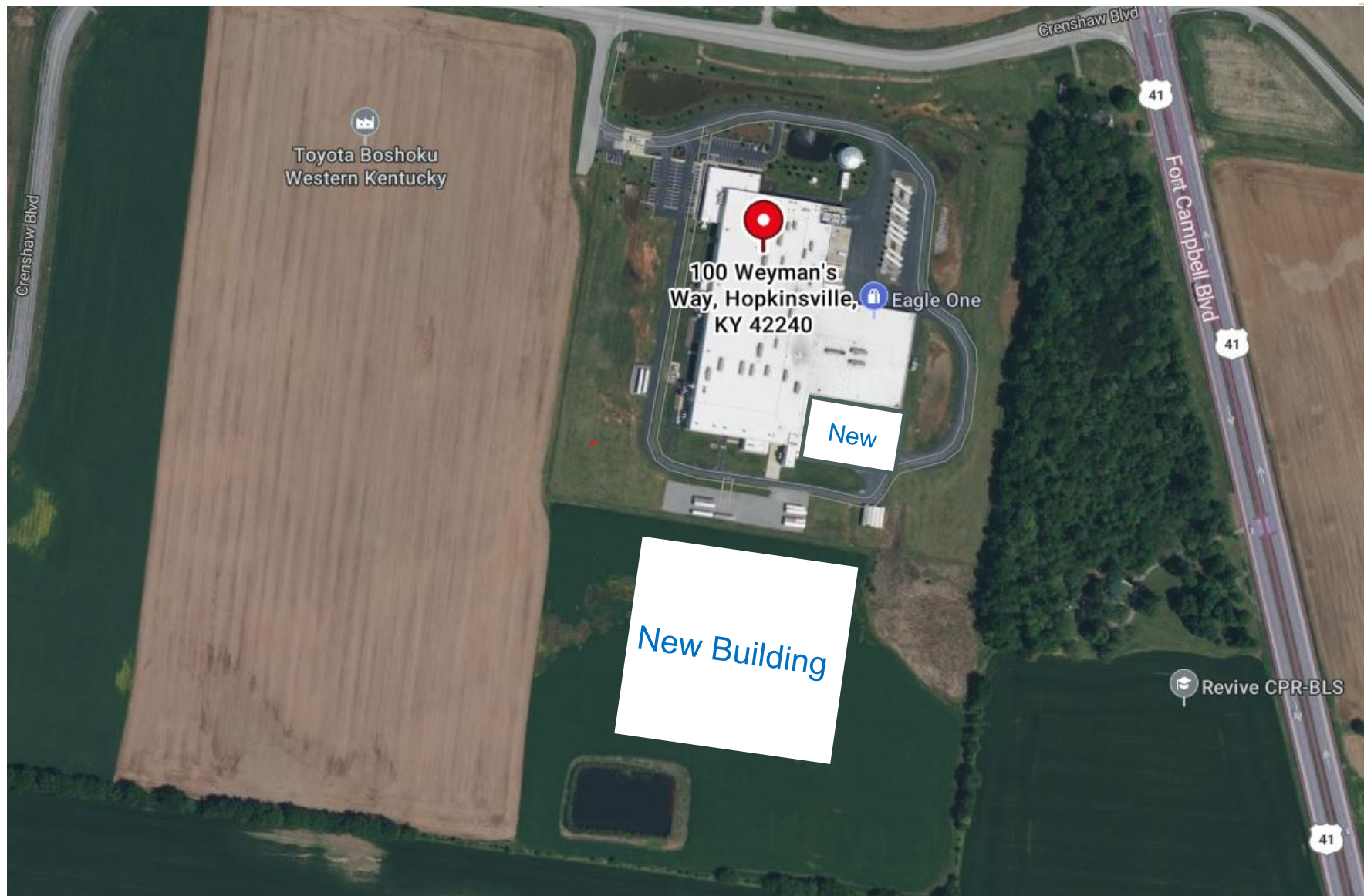
The U.S. Smokeless Tobacco Company (USSTC), Eagle One Facility, is located at 100 Weyman's Way, Hopkinsville, KY 42240, which is within the southern city limits of Hopkinsville. The permitted facility includes a Dry Flour Plant, a Tobacco Curing Operation, Tobacco Finishing Process, and various support facilities/operations. In May 2025, USSTC submitted a Title V renewal application to renew the Title V permit (V-20-002) issued December 6, 2020. In the renewal application, USSTC requested that the renewal permit also allow for the installation of a second finishing mixer in Emissions Unit 14. No increase in throughput or emissions was requested. The new mixer simply allowed for higher product integrity. A Title V renewal permit has not been issued yet.

USSTC is now submitting this application to obtain a significant revision to the Title V permit to add additional emissions units or equipment to the site as follows:

- A seventh bulking bin and a fifth cutter and dust collector in Emission Unit 01.
- Four storage silos in Emission Unit 02.
- A second low moisture into cure mixer (cylinder mixer), and various feed systems in Emission Unit 03.
- A second cure bin dumper, a tobacco pre-conditioner, and three additional finishing mixers (for a total of four finishing mixers) in Emission Unit 14.
- Emission Unit 15 (packing process), a new process, where finished tobacco is packed into cans, pouches and mesh packs.
- Emission Unit 16 (25 kWe generator).
- Emission Unit 17 (100 kWe generator).

The Eagle One Facility receives tobacco stems and leaf and produces dried tobacco and cured tobacco. In addition, the site can transfer and process tobacco intermediates to and from other USSTC facilities as contingencies. Cured tobacco is finished on site and previously was shipped to other USSTC facilities to be packaged into smokeless tobacco products. USSTC will now package all products at this facility.

A complete Title V application has been prepared that reflects all existing emission units, all new equipment, and new emission units. A site location map is provided in **Figure 1**. An overview of the site's existing processes and emission units is provided in **Figure 2**. A summary of the site-wide uncontrolled and unlimited Potential to Emit (PTE) is provided in **Table 1** and a revised summary of the site's controlled and limited PTE is provided in **Table 2**.



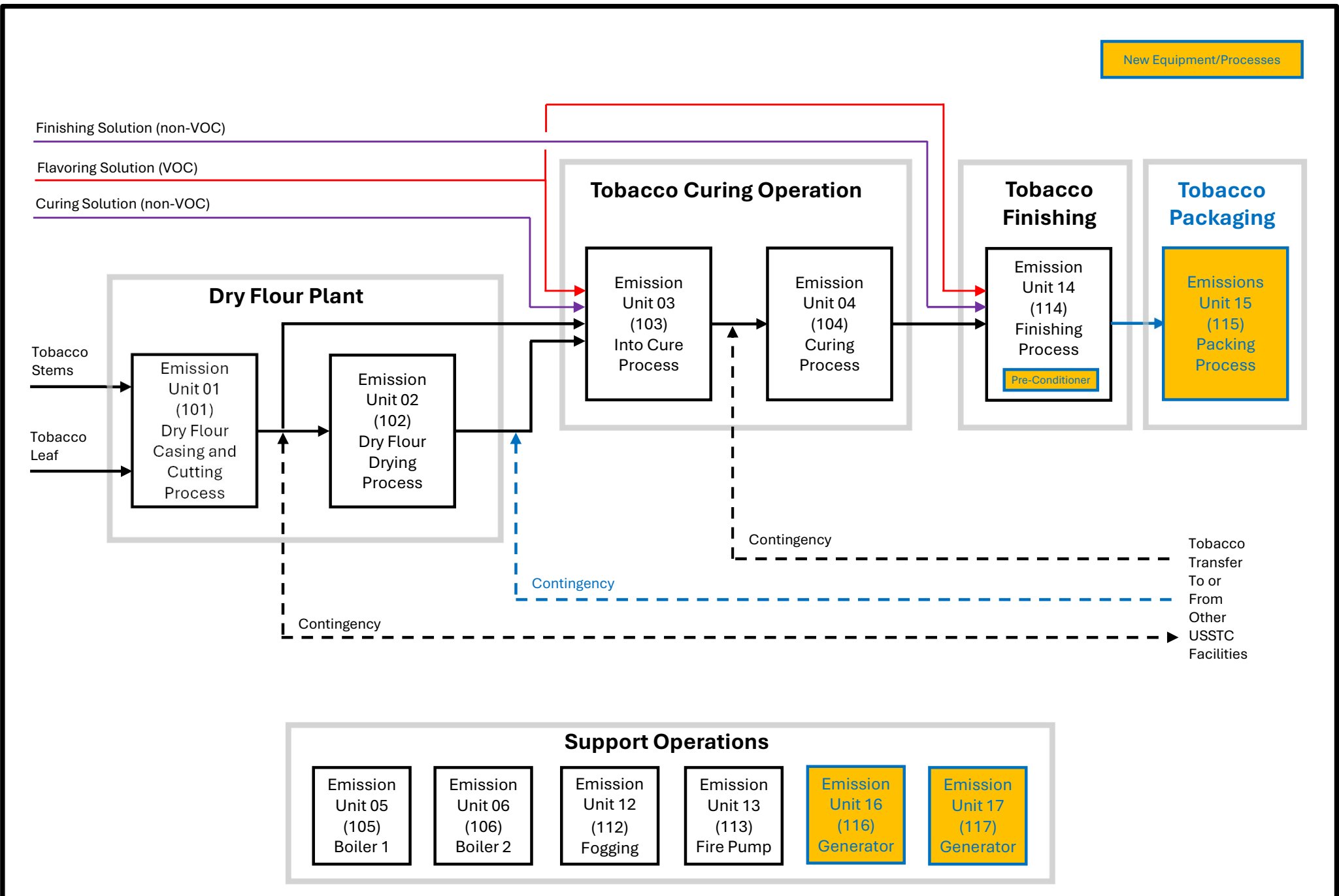


Table 1
U.S. Smokeless Tobacco Co. - Eagle One Facility
Site-wide Uncontrolled and Unlimited Potential to Emit (PTE) Summary

May 2026

Emission Unit		Uncontrolled and Unlimited PTE (tons/yr)							
		PM / PM ₁₀	SO ₂	NO _x	CO	VOC	GHG	HAPs	NH3
Dry Flour Plant	Emission Unit 01 (101) Dry Flour Casing Process	227.13	--	--	--	18.99	--	--	
	Emission Unit 02 (102) Dry Flour Drying Process	201.44	0.01	2.80	1.66	61.72	2,743	--	14.24
Tobacco Curing Operation	Emission Unit 03 (103) Into Cure Process	3.75	--	--	--	301.44	--	--	--
	Emission Unit 04 (104) Curing Process	Negligible	Negligible	49.25	1.19	61.35	2,005	0.20	89.00
Support Operations	Emission Unit 05 (105) Boiler 1	1.93	0.09	20.32	11.73	1.25	19,651	Negligible	Negligible
	Emission Unit 06 (106) Boiler 2	1.93	0.09	20.32	11.73	1.25	19,651	Negligible	Negligible
	Emission Unit 12 (112) Pesticide Fogging	--	--	--	--	0.55	--	--	--
	Emission Unit 13 (113) Fire Pump	0.126	0.011	6.48	1.08	0.18	1216.43	Negligible	Negligible
Support Operations (new)	Emission Unit 16 (116) 25kWe Generator	0.032	0.001	2.16	19.69	0.02	225.43	--	--
	Emission Unit 17 (117) 100 kWe Generator	0.102	0.003	3.94	7.88	0.06	881.19	--	--
Tobacco Finishing	Emission Unit 14 (114) Tobacco Finishing Process	--	--	--	--	170.03	--	--	--
Tobacco Packing (new)	Emission Unit 15 (115) Tobacco Packing Process	--	--	--	--	51.44	--	--	--
	Emission Unit 15 (115) Equipment Cleaning	--	--	--	--	15.50	--	--	--
Insignificant Activities	Pressurized propane tanks	--	--	--	--	Negligible	--	--	--
	Small parts cleaners	--	--	--	--	0.25	--	--	--
	Laboratory fume hoods for physical/chemical analyses	--	--	--	--	Negligible	--	Negligible	--
	Curing Room Heater	0.06	Negligible	0.79	0.66	0.04	948.45	--	--
	Cure Bin Washing Operation	--	--	--	--	Negligible	--	--	--
	Rolling Bin Washing Operation	--	--	--	--	Negligible	--	--	--
Site-wide PTE		436.5	0.2	106.1	55.6	684.1	47,323	0.20	103.2

Table 2
U.S. Smokeless Tobacco Co. - Eagle One Facility
Site-wide Controlled and Limited Potential to Emit (PTE) Summary

May 2026

Emission Unit		Controlled and Limited PTE (tons/yr)							
		PM / PM ₁₀	SO ₂	NO _x	CO	VOC	GHG	HAPs	NH3
Dry Flour Plant	Emission Unit 01 (101) Dry Flour Casing Process	11.63	--	--	--	5.09	--	--	--
	Emission Unit 02 (102) Dry Flour Drying Process	8.89	Negligible	0.72	0.42	15.84	704	--	3.65
Tobacco Curing Operation	Emission Unit 03 (103) Into Cure Process	0.34	--	--	--	46.70	--	--	--
	Emission Unit 04 (104) Curing Process	Negligible	Negligible	49.25	1.19	61.35	2,005	0.20	71.56
Support Operations	Emission Unit 05 (105) Boiler 1	1.93	0.09	20.32	11.73	1.25	19,651	Negligible	Negligible
	Emission Unit 06 (106) Boiler 2	1.93	0.09	20.32	11.73	1.25	19,651	Negligible	Negligible
	Emission Unit 12 (112) Pesticide Fogging	--	--	--	--	0.55	--	--	--
	Emission Unit 13 (113) Fire Pump	0.007	0.001	0.37	0.06	0.01	69.44	Negligible	Negligible
Support Operations (new)	Emission Unit 16 (116) 25kWe Generator	0.002	0.000	0.12	1.12	0.001	12.9	--	--
	Emission Unit 17 (117) 100 kWe Generator	0.006	0.000	0.22	0.45	0.003	50.3	--	--
Tobacco Finishing	Emission Unit 14 (114) Tobacco Finishing Process	--	--	--	--	63.25	--	--	--
Tobacco Packing (new)	Emission Unit 15 (115) Tobacco Packing Process	--	--	--	--	15.69	--	--	--
	Emission Unit 15 (115) Equipment Cleaning	--	--	--	--	4.73	--	--	--
Insignificant Activities	Pressurized propane tanks	--	--	--	--	Negligible	--	--	--
	Small parts cleaners	--	--	--	--	0.25	--	--	--
	Laboratory fume hoods for physical/chemical analyses	--	--	--	--	Negligible	--	Negligible	--
	Curing Room Heater	0.06	Negligible	0.79	0.66	0.04	948.45	--	--
	Cure Bin Washing Operation	--	--	--	--	Negligible	--	--	--
	Rolling Bin Washing Operation	--	--	--	--	Negligible	--	--	--
Site-wide PTE		24.8	0.2	92.1	27.4	216.0	43,093	0.20	75.2

Section AI.4: Type of Application

Current Status:	☒ Title V	☐ Conditional Major	☐ State-Origin	☐ General Permit	☐ Registration	☐ None
	☐ Name Change	☐ Initial Registration	☒ Significant Revision	☐ Administrative Permit Amendment		
Requested Action: (check all that apply)	☒ Renewal Permit	☐ Revised Registration	☐ Minor Revision	☐ Initial Source-wide Operating Permit		
	☐ 502(b)(10) Change	☐ Extension Request	☐ Addition of New Facility	☐ Portable Plant Relocation Notice		
	☐ Revision	☐ Off Permit Change	☐ Landfill Alternate Compliance Submittal	☐ Modification of Existing Facilities		
	☐ Ownership Change	☐ Closure				
Requested Status:	☒ Title V	☐ Conditional Major	☐ State-Origin	☐ PSD	☐ NSR	☐ Other: _____

Is the source requesting a limitation of potential emissions?

☒ Yes

☐ No

Pollutant:	Requested Limit:	Pollutant:	Requested Limit:
☐ Particulate Matter	_____	☐ Single HAP	_____
☒ Volatile Organic Compounds (VOC)	<u>216 tpy (site-wide -Section D)</u>	☐ Combined HAPs	_____
☐ Carbon Monoxide	_____	☐ Air Toxics (40 CFR 68, Subpart F)	_____
☐ Nitrogen Oxides	_____	☐ Carbon Dioxide	_____
☐ Sulfur Dioxide	_____	☐ Greenhouse Gases (GHG)	_____
☐ Lead	_____	☐ Other	_____

For New Construction:

Proposed Start Date of Construction:
(MM/YYYY)

Proposed Operation Start-Up Date: (MM/YYYY)

For Modifications:

Proposed Start Date of Modification:
(MM/YYYY)

Proposed Operation Start-Up Date: (MM/YYYY)

Applicant is seeking coverage under a permit shield.

☐ Yes

☒ No

Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.

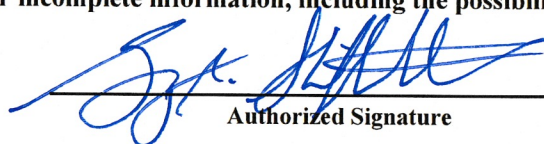
Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

- | | |
|--|---|
| ☒ DEP7007A Indirect Heat Exchangers and Turbines | ☒ DEP7007CC Compliance Certification |
| ☒ DEP7007B Manufacturing or Processing Operations | ☒ DEP7007DD Insignificant Activities |
| ☐ DEP7007C Incinerators and Waste Burners | ☒ DEP7007EE Internal Combustion Engines |
| ☐ DEP7007F Episode Standby Plan | ☐ DEP7007FF Secondary Aluminum Processing |
| ☐ DEP7007J Volatile Liquid Storage | ☒ DEP7007GG Control Equipment |
| ☐ DEP7007K Surface Coating or Printing Operations | ☐ DEP7007HH Haul Roads |
| ☐ DEP7007L Mineral Processes | ☐ Confidentiality Claim |
| ☐ DEP7007M Metal Cleaning Degreasers | ☐ Ownership Change Form |
| ☒ DEP7007N Source Emissions Profile | ☐ Secretary of State Certificate |
| ☐ DEP7007P Perchloroethylene Dry Cleaning Systems | ☒ Flowcharts or diagrams depicting process |
| ☐ DEP7007R Emission Offset Credit | ☐ Digital Line Graphs (DLG) files of buldings, roads, etc. |
| ☐ DEP7007S Service Stations | ☒ Site Map |
| ☐ DEP7007T Metal Plating and Surface Treatment Operations | ☒ Map or drawing depicting location of facility |
| ☒ DEP7007V Applicable Requirements and Compliance Activities | ☐ Safety Data Sheet (SDS) |
| ☐ DEP7007Y Good Engineering Practice and Stack Height Determination | ☐ Emergency Response Plan |
| ☐ DEP7007AA Compliance Schedule for Non-complying Emission Units | ☐ Other: _____ |
| ☐ DEP7007BB Certified Progress Report | |

Section AI.6: Signature Block

I, the undersigned, hereby certify under penalty of law, that I am a responsible official*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.



 Authorized Signature

Greg A. Shiflett

Type or Printed Name of Signatory

5/12/20

 Date

VP Manufacturing

Title of Signatory

*Responsible official as defined by 401 KAR 52:001.

Dry Flour Plant

Eagle One Facility
U.S. Smokeless Tobacco Company
Hopkinsville, KY

Emissions Units

- ♦ Emission Unit 01 (101) Dry Flour Casing and Cutting Process –
Process Description, Process Flow Diagram, and Forms DEP7007B,
DEP7007N, and DEP7007V
- ♦ Emission Unit 02 (102) Dry Flour Drying Process –
Process Description, Process Flow Diagram, and Forms DEP7007B,
DEP7007N, and DEP7007V

Dry Flour Plant Process Description

The Dry Flour Plant consists of Emission Unit 01 (101) Dry Flour Casing and Cutting Process and Emission Unit 02 (102) Dry Flour Drying Process described in the next section.

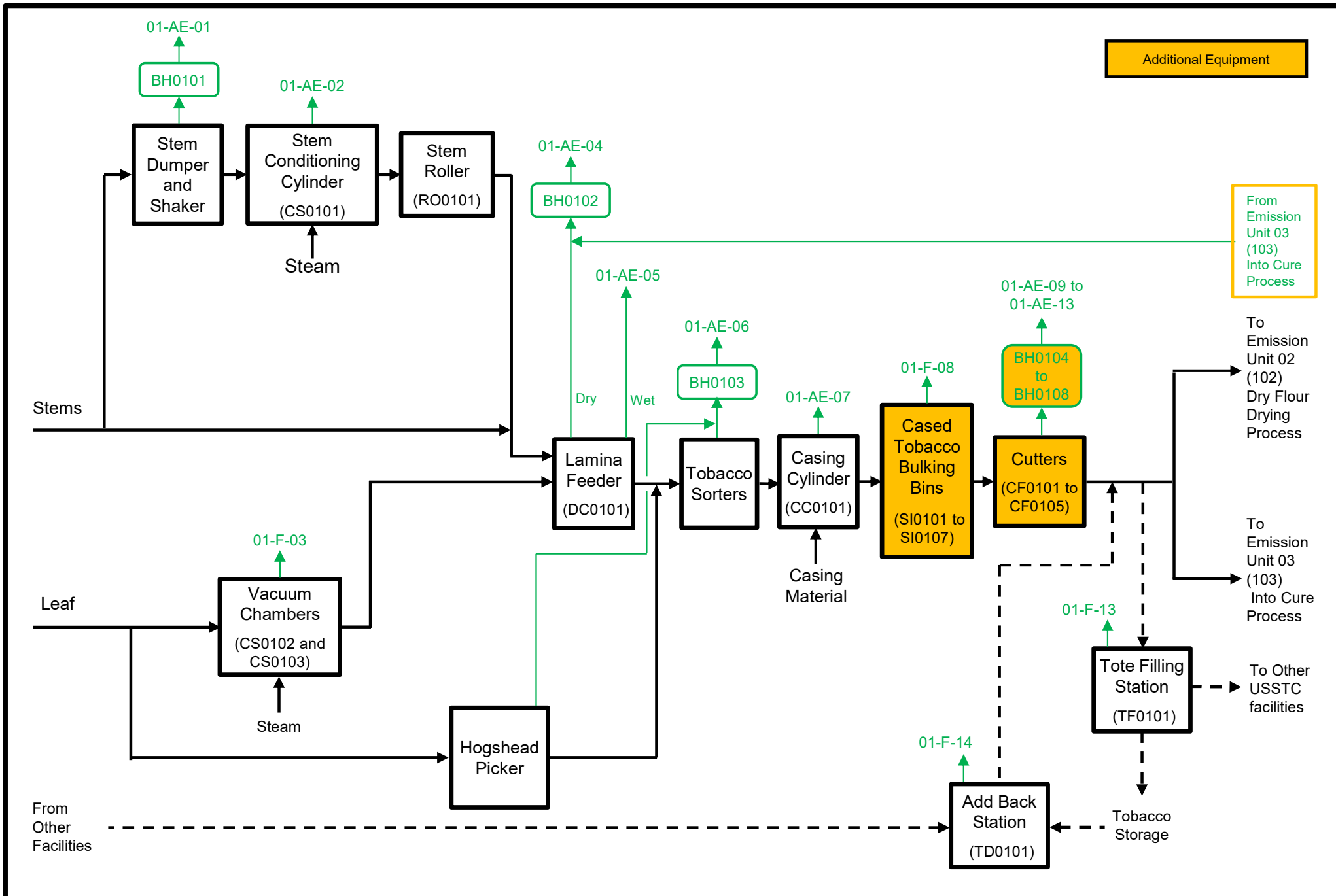
EMISSION UNIT 01 (101) DRY FLOUR CASING AND CUTTING PROCESS

Tobacco stems enter the process in either of two locations: the stem dumper and shaker or the lamina feeder which bypasses the stem processing step. The stem feeder is used to transfer stems to the stem conditioning cylinder. The stem feeder has hoods at various points that pick up generated dust and route it to a 5,000 cfm global dust collector (BH0101) for control of particulate matter. The conditioning cylinder applies steam to the tobacco stems before they enter the stem roller. The flattened tobacco stems from the stem roller are transported to the lamina feeder for continued processing.

Tobacco Leaf enters the process in either of two locations: the vacuum chambers or the hogshead picker. The vacuum chambers apply steam to the tobacco leaf before the leaf enters the lamina feeder. Dust pickup hoods associated with the lamina feeder (dry material operation) are routed to a 9,000 cfm global dust collector (BH0102) for control of particulate matter. A tote dumper and use hoppers (located in EU03) are also routed to BH0102 for control of particulate matter.

Leaf tobacco can also go through the hogshead picker where the leaf is removed from its storage container and added to the process before the tobacco sorters. Tobacco stem and leaf from the lamina feeder and/or hogshead picker are run through the tobacco sorters to remove any non-tobacco material. Dust pickup hoods associated with the hogshead picker, the tobacco sorters, and various conveyors are routed to a 30,000 cfm global dust collector (BH0103) for control of particulate matter. Tobacco then enters the casing cylinder where liquid materials are applied to the tobacco. Cased tobacco is temporarily stored in bulking bins (one additional will be added for a total of seven bulking bins) then sent through cutters (one additional will be added for a total of five cutters) as the final step of the Dry Flour Casing and Cutting Process. The four cutters are each equipped with a dust collector.

The resulting product is transferred to Emission Unit 02 (102) Dry Flour Drying Process, Emission Unit 03 (103) Into Cure Process, or the Tote Filling Station (TF0101) to allow for on-site storage or transfer off site. Stored tobacco re-enters the process via the Add Back Station (TD0101). As a contingency, cut tobacco from other facilities can also be introduced via the Add Back Station (TD0101). A process flow diagram for Emission Unit 01 (101) Dry Flour Casing and Cutting Process is provided as **Figure 3**.



Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007B Manufacturing or Processing Operations Section B.1: Process Information Section B.2: Materials and Fuel Information Section B.3: Notes, Comments, and Explanations	Additional Documentation Complete DEP7007A1, DEP7007N, DEP7007V, and DEP7007GG. Attach a flow diagram Attach SDS
--	---	--

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: May 2026

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process <u>Continuous</u> or <u>Batch</u> ?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
01 (101)	Dry Flour Casing and Cutting Process	see process description	BH0101	Stem Dumper and Shaker			2015	Continuous		
			CS0101	Stem Conditioning Cylinder			2015	Continuous		
			CS0102 & CS0103	Two Vacuum Chambers			2015	Continuous		
			BH0102	Lamina Feeder Dry Material			2015	Continuous		
			DC0101	Lamina Feeder Wet Material			2015	Continuous		
			BH0103	Tobacco Sorter, Hogshead Picker, Conveyors			2015	Continuous		
			CC0101	Casing Cylinder			2015	Continuous		
			SI0101 to SI0107	Seven Bulking Bins			2015, 2027	Continuous		
			CF0101 to CF0105	Five Cutters			2015, 2027	Continuous		
			TF0101	Tote Filling Station			2015	Continuous		
			TD0101	Add Back Station			2015	Continuous		

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
01 (101)	Dry Flour Casing and Cutting Process	Tobacco Stems	2.5	tons/hr	2.5	Cut and Cased Tobacco	2.5	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Tobacco Leaf	12	tons/hr	12	Cut and Cased Tobacco	12	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Total Tobacco Stems and Leaf	12	tons/hr	12	Cut and Cased Tobacco	12	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007N Source Emissions Profile __ Section N.1: Emission Summary __ Section N.2: Stack Information __ Section N.3: Fugitive Information __ Section N.4: Notes, Comments, and Explanations	Additional Documentation __ Complete DEP7007AI
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Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: May 2026

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
01 (101)	Dry Flour Casing and Cutting Process	BH0101	Stem Dumper and Shaker	Global Dust Collector	BH0101	01-AE-01	2.5	PM	1.714	Engr. Est.	100%	90%	4.29	0.43	18.77	1.88
		CS0101	Stem Conditioning Cylinder			01-AE-02	2.5	PM	0.140	Engr. Est.			0.35	0.35	1.53	1.53
		CS0102 & CS0103	Two Vacuum Chambers			01-F-03	12 (Total)	PM	0.020	Engr. Est.			0.24	0.24	1.05	0.22
		BH0102	Lamina Feeder Dry Material	Global Dust Collector	BH0102	01-AE-04	12.0	PM	1.286	Engr. Est.	100%	90%	15.43	1.54	67.58	1.45
		DC0101	Lamina Feeder Wet Material			01-AE-05	12.0	PM	0.061	Engr. Est.			0.73	0.73	3.21	0.69

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
01 (101)	Dry Flour Casing and Cutting Process	BH0103	Tobacco Sorter, Hogshead Picker, Conveyors	Global Dust Collector	BH0103	01-AE-06	12.0	PM	2.143	Engr. Est.	100%	90%	25.71	2.57	112.63	2.41
		CC0101	Casing Cylinder			01-AE-07	12.0	PM	0.061	Engr. Est.			0.73	0.73	3.21	0.69
		SI0101 to S10107	Seven Bulking Bins			01-F-08	12 (Total)	PM	0.061	Engr. Est.			0.73	0.73	3.21	0.69
		CF0101 to CF0105	Five Cutters	Dust Collectors	BH0104 to BH0108	01-AE-09 through 01-AE-13	12 (Total)	PM	0.131	Engr. Est.	100%	90%	1.58	0.16	6.91	0.15
		TF0101	Tote Filling Station			01-F-13	12.0	PM	0.086	Engr. Est.			1.03	1.03	4.52	0.97
		TD0101	Add Back Station			01-F-14	12.0	PM	0.086	Engr. Est.			1.03	1.03	4.52	0.97

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007N Source Emissions Profile __ Section N.1: Emission Summary __ Section N.2: Stack Information __ Section N.3: Fugitive Information __ Section N.4: Notes, Comments, and Explanations	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center; font-weight: bold;">Additional Documentation</td> </tr> <tr> <td style="padding: 5px;"> __ Complete DEP7007AI </td> </tr> </table>	Additional Documentation	__ Complete DEP7007AI
Additional Documentation				
__ Complete DEP7007AI				

Source Name:	U.S. Smokeless Tobacco Company - Eagle One Facility
KY EIS (AFS) #:	21-
Permit #:	V-20-002
Agency Interest (AI) ID:	121768
Date:	May 2026

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
01 (101)	Dry Flour Casing and Cutting Process	BH0101	Stem Dumper and Shaker			01-AE-01	2.5	VOC	0.031	Engr. Est.			0.08	0.08	0.34	0.34
		CS0101	Stem Conditioning Cylinder			01-AE-02	2.5	VOC	0.089	Engr. Est.			0.22	0.22	0.97	0.97
		CS0102 & CS0103	Two Vacuum Chambers			01-F-03	12 (Total)	VOC	0.017	Engr. Est.			0.20	0.20	0.88	0.19
		BH0102	Lamina Feeder Dry Material			01-AE-04	12.0	VOC	0.012	Engr. Est.			0.14	0.14	0.62	0.13
		DC0101	Lamina Feeder Wet Material			01-AE-05	12.0	VOC	0.039	Engr. Est.			0.47	0.47	2.05	0.44

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
01 (101)	Dry Flour Casing and Cutting Process	BH0103	Tobacco Sorter, Hogshead Picker, Conveyors			01-AE-06	12.0	VOC	0.195	Engr. Est.			2.34	2.34	10.25	2.19
		CC0101	Casing Cylinder			01-AE-07	12.0	VOC	0.063	Engr. Est.			0.76	0.76	3.31	0.71
		S10101 to S10107	Seven Bulking Bins			01-F-08	12 (Total)	VOC	0.000	Engr. Est.			0.00	0.00	0.00	0.00
		CF0101 to CF0105	Five Cutters			01-AE-09 through 01-AE-13	12(Total)	VOC	0.011	Engr. Est.			0.13	0.13	0.57	0.12
		TF0101	Tote Filling Station			01-F-13	12.0	VOC	N/A	Engr. Est.						
		TD0101	Add Back Station			01-F-14	12.0	VOC	N/A	Engr. Est.						

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (°F)	Exit Velocity (ft/sec)
01-AE-01	Process: BH0101 Control: BH0101	2.30	19.50	0.00			5,000	Ambient	20.06
01-AE-02	Process: CS0101 Control: None	0.71	41.33	1.00			1,500	110.00	63.44
01-AE-04	Process: BH0102 Control: BH0102	2.30	19.50	3.00			9,000	Ambient	36.10
01-AE-05	Process: DC0101 Control: None	1.33	43.50	4.00			6,000	Ambient	71.98
01-AE-06	Process: BH0103 Control: BH0103	3.30	22.50	5.00			30,000	Ambient	58.46
01-AE-07	Process: CC0101 Control: None	0.71	41.33	6.00			1,500	Ambient	63.44
01-AE-09 through 01-AE-13	Process: CF0101 to CF0105 Control: BH0104 to BH0108	0.50	10.58	8.00			230	Ambient	19.52

Section N.3: Fugitive Information								
UTM Zone:								
Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)
01 (101)	Dry Flour Casing and Cutting Process	CS0102 & CS0103					110	4
		SI0101 to S10107					Ambient	8
		TF0101					Ambient	4
		TD0101					Ambient	4

Section N.4: Notes, Comments, and Explanations

EU01 is limited in the permit to 22,482 tons per year of total tobacco. The portion of this that can come from stems is no more than 21,900. These number are used to calculate the controlled potential emissions.

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

DEP7007GG

Control Equipment

Additional Documentation

- ☐ Complete Sections GG.1 through GG.12, as applicable
- ☐ Attach manufacturer's specifications for each control device
- ☐ Complete DEP7007AI

Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)

Agency Interest (AI) ID: [121768](#)

Date: [May 2026](#)

Section GG.1: General Information - Control Equipment

Control Device ID #	Control Device Name	Cost	Manufacturer	Model Name/ Serial #	Date Installed	Inlet Gas Stream Data For <u>All</u> Control Devices					Inlet Gas Stream Data For Condensers, Adsorbers, Afterburners, Incinerators, Oxidizers <u>Only</u>			Equipment Operational Data For <u>All</u> Control Devices		
						Temperature ($^{\circ}F$)	Flowrate (scfm @ 68 $^{\circ}F$)	Average Particle Diameter (μm)	Particle Density (lb/ft^3) or Specific Gravity	Gas Density (lb/ft^3)	Gas Moisture Content (%)	Gas Composition	Fan Type	Pressure Drop Range (in. H_2O)	Pollutants Collected/ Controlled	Pollutant Removal (%)
BH0101	Global Dust Collector		Schenck Process, LLC	3M2F12 MAC2FLO FILTER	2015	Ambient	5,000 cfm	< 100 μm est.		0.075 (air)				manufacturer recommendation	PM	0.9
BH0102	Global Dust Collector		TBD	TBD	2015	Ambient	9,000 cfm	< 100 μm est.		0.075 (air)				manufacturer recommendation	PM	0.9
BH0103	Global Dust Collector		TBD	TBD	2015	Ambient	30,000 cfm	< 100 μm est.		0.075 (air)				manufacturer recommendation	PM	0.9
BH0104 to BH0108	Dust Collectors		Schenck Process, LLC	54AVR14 STY III FLTR	2015, 2027	Ambient	230 (each)	< 100 μm est.		0.075 (air)				manufacturer recommendation	PM	0.9

Section GG.6: Filter

Control Device ID #	Identify all Emission Units and Control Devices that Feed to Filter	Identify Type of Filter Unit: Baghouse, Cartridge Collector, or Other (specify)	Identify Type of Filtering Material: Fabric, Paper, Synthetic, or Other (specify)	Total Filter Area (ft ²)	Effective Air-to-Filter Ratio (acfm/ft ²)	Continuous Monitoring Instrumentation (e.g. COMS, BLDS, none)	Additional Materials Introduced into the Control System (e.g. lime, carbon)		Identify Cleaning Method: Shaker, Pulse Air, Reverse Air, Pulse Jet, or Other (specify)	Identify Gas Cooling Method: Ductwork, Heat Exchanger, Bleed-in Air, Water Spray, or Other (specify)	For Ductwork:		For Bleed-in Air:	For Water Spray:
							Material	Injection Rate (lb/hr)			Length (ft)	Diameter (ft)	Flowrate (scfm @ 68°F)	Flowrate (gal/min)
BH0101	Stem Dumper and Shaker	Cartridge Collector	Non-woven polyester nanofiber cartridges	3,048	1.6	None	N/A	N/A	Reverse Air	N/A				
BH0102	Lamina Feeder Dry Material	Cartridge Collector	Non-woven polyester nanofiber cartridges	6,096	1.5	None	N/A	N/A	Reverse Air	N/A				
BH0103	Tobacco Sorter, Hogshead Picker, Conveyors	Cartridge Collector	Non-woven polyester nanofiber cartridges	16,256	1.8	None	N/A	N/A	Reverse Air	N/A				
BH0104 to BH0108	Five Cutters	Five Baghouses	bags	125	1.8	None	N/A	N/A	Reverse Air	N/A				

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities ___ Section V.1: Emission and Operating Limitation(s) ___ Section V.2: Monitoring Requirements ___ Section V.3: Recordkeeping Requirements ___ Section V.4: Reporting Requirements ___ Section V.5: Testing Requirements ___ Section V.6: Notes, Comments, and Explanations	Additional Documentation ___ Complete DEP7007AI																																								
Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility KY EIS (AFS) #: 21- Permit #: V-20-002 Agency Interest (AI) ID: 121768 Date: May 2026																																										
Section V.1: Emission and Operating Limitation(s) <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 10%;">Emission Unit #</th> <th style="width: 15%;">Emission Unit Description</th> <th style="width: 15%;">Applicable Regulation or Requirement</th> <th style="width: 10%;">Pollutant</th> <th style="width: 15%;">Emission Limit (if applicable)</th> <th style="width: 10%;">Voluntary Emission Limit or Exemption (if applicable)</th> <th style="width: 10%;">Operating Requirement or Limitation (if applicable)</th> <th style="width: 25%;">Method of Determining Compliance with the Emission and Operating Requirement(s)</th> </tr> </thead> <tbody> <tr> <td style="color: blue;">101</td> <td style="color: blue;">Dry Flour Casing Process</td> <td style="color: blue;">59:010 Section 3(2)</td> <td style="color: blue;">PM</td> <td style="color: blue;">PM (lb/hr) = 3.59*P^{0.62} (P = Hourly Processing Weight in tons/hr)</td> <td></td> <td></td> <td style="color: blue;">Emission Factor, Maximum Rated Capacity of the equipment, and Control Devices operating</td> </tr> <tr> <td></td> <td></td> <td style="color: blue;">Permit condition</td> <td style="color: blue;">Throughput</td> <td></td> <td></td> <td style="color: blue;">22,482 tons total tobacco/year</td> <td style="color: blue;">Monthly and 12-Month Rolling Throughput records</td> </tr> <tr> <td></td> <td></td> <td style="color: blue;">59:010 Section 3 (1)(a)</td> <td style="color: blue;">Opacity</td> <td style="color: blue;">20%</td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td style="color: blue;">Permit condition</td> <td style="color: blue;">VOC</td> <td style="color: blue;">Part of site-wide limit under Section D</td> <td></td> <td></td> <td style="color: blue;">Formulas in Section D</td> </tr> </tbody> </table>			Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)	101	Dry Flour Casing Process	59:010 Section 3(2)	PM	PM (lb/hr) = 3.59*P ^{0.62} (P = Hourly Processing Weight in tons/hr)			Emission Factor, Maximum Rated Capacity of the equipment, and Control Devices operating			Permit condition	Throughput			22,482 tons total tobacco/year	Monthly and 12-Month Rolling Throughput records			59:010 Section 3 (1)(a)	Opacity	20%						Permit condition	VOC	Part of site-wide limit under Section D			Formulas in Section D
Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)																																			
101	Dry Flour Casing Process	59:010 Section 3(2)	PM	PM (lb/hr) = 3.59*P ^{0.62} (P = Hourly Processing Weight in tons/hr)			Emission Factor, Maximum Rated Capacity of the equipment, and Control Devices operating																																			
		Permit condition	Throughput			22,482 tons total tobacco/year	Monthly and 12-Month Rolling Throughput records																																			
		59:010 Section 3 (1)(a)	Opacity	20%																																						
		Permit condition	VOC	Part of site-wide limit under Section D			Formulas in Section D																																			

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
101	Dry Flour Casing Process	PM	59:010 Section 3(2)	Operation	The control devices automatically turn on when the underlying processes are started.
		Throughput	Permit Condition	Operation	Production Records
		Opacity			Monthly visual observations (requested change to permit) Weekly visual observations

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
101	Dry Flour Casing Process	PM	Permit Condition	Production and Emission Rate	Production throughputs are totaled each month and used to calculate average hourly emissions
		Throughput	Permit Condition	Production	Production throughputs are totaled each month
		Opacity	None	Visual observations	Log of all qualitative visual observations of emissions from each stack, any corrective actions taken and any U.S. EPA Reference Method 9 readings performed

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
101	Dry Flour Casing Process	PM	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals
		Throughput	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals
		Opacity	None	None	None

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
101	Dry Flour Casing Process	PM	None	None	None
		Throughput	None	None	None
		Opacity	None	None	None

Dry Flour Plant Process Description

The Dry Flour Plant consists of Emission Unit 01 (101) and Emission Unit 02 (102).

EMISSION UNIT 02 (102) DRY FLOUR DRYING PROCESS

Cased and cut tobacco that is processed in the Dry Flour Drying Process is dried in either the fluidized bed drying line (102A) or the DLL drying line (102B). Cased and cut tobacco enters this process from Emission Unit 01 (101) Dry Flour Casing and Cutting Process or from other USSTC facilities.

Fluidized Bed Drying Line

The fluidized bed drying line has a fluidized bed dryer that allows the hot air to dry the tobacco. The fluidized bed dryer combusts natural gas to provide heat for drying and particulate emissions are controlled by a cyclone (CY0201). A small amount of dust is captured by a dust collector (BH0201) and is returned to the process.

After the tobacco exits the fluidized bed dryer, it is either transferred into totes or transported to the sifting operation by enclosed drag chain conveyors. Tobacco that enters the sifting operation is screened and the oversized pieces are isolated and resized. Sifted tobacco is either placed into totes or transported to a surge silo. A 4,000 cfm global dust collector (BH0202) is used to control particulate emissions from the conveyors, sifters, tote filling station and surge silo.

Sifted tobacco in the surge silo is pneumatically conveyed to storage silos or a truck filling station equipped with a dust collector (BH0204).

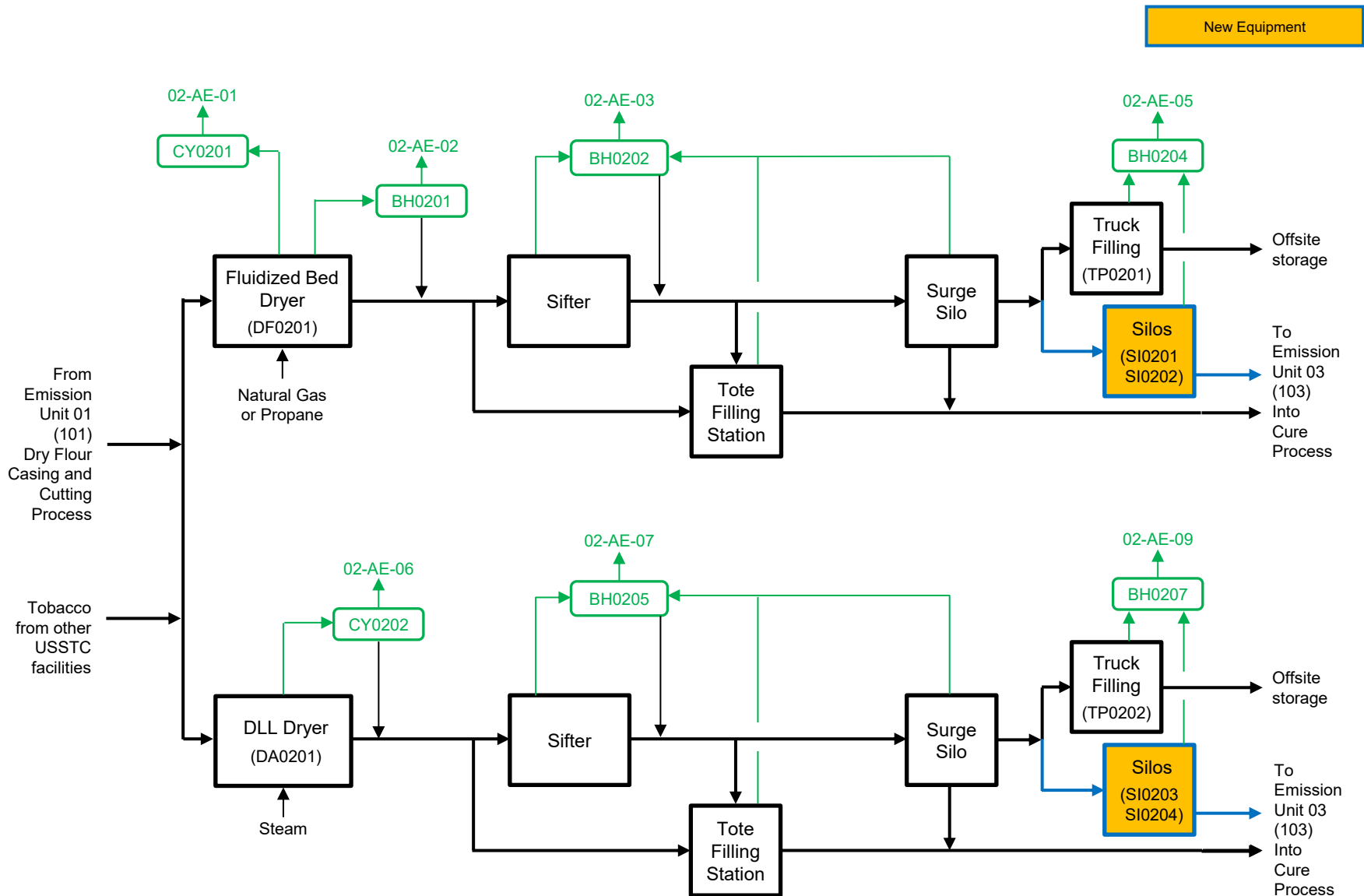
DLL Drying Line

The DLL dryer line has a DLL dryer that uses steam to dry the tobacco. The DLL dryer has a cyclone (CY0202) that controls particulate emissions from the dryer. After the tobacco exits the DLL dryer, it is either transferred into totes or transported to the sifting operation by enclosed drag chain conveyors. Tobacco that enters the sifting operation is screened and the oversized pieces are isolated and resized. Sifted tobacco is either placed into totes or transported to the surge silo.

A 4,000 cfm global dust collector (BH0205) is used to control particulate emissions from the conveyors, sifters, tote filling station and surge silo.

Sifted tobacco in the surge silo is pneumatically conveyed to storage silos or a truck filling station equipped with a dust collector (BH0207).

A simplified process flow diagram for Emission Unit 02 (102) is provided as **Figure 4**.



Division for Air Quality

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DEP7007B

Manufacturing or Processing Operations

- Section B.1: Process Information
Section B.2: Materials and Fuel Information
~~Section B.3: Notes, Comments, and Explanations~~

Additional Documentation

- Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
Attach a flow diagram
Attach SDS

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: May 2026]

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process <u>Continuous</u> or <u>Batch</u> ?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
02 (102)	Dry Flour Drying Process	see process description								
			Fluidized Bed Drying Line 102A							
			DF0201	Fluidized Bed Dryer			2015	Continuous		
			BH0201	Fluidized Bed Dryer Dust Return			2015	Continuous		
			BH0202	Conveyors, Sifting, Tote Filling, and Surge Silo			2015	Continuous		
			SI0201-2	Silos Filling			2027	Continuous		
			TP0201	Truck Filling			2015	Continuous		
			DLL Drying Line 102B							
			DA0201	DLL Dryer			2015	Continuous		
			BH0205	Conveyors, Sifting, Tote Filling, and Surge Silo			2015	Continuous		
			SI0203-4	Silos Filling			2027	Continuous		
			TP0202	Truck Filling			2015	Continuous		

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
02 (102)	Dry Flour Drying Process														
	Fluidized Bed Drying Line 102A														
		Cased Tobacco	5	tons/hr	5	Cased Tobacco	5	tons/hr	Natural Gas (primary)	4500	scf	No Limit requested (exhausts with process)		N/A	N/A
									Propane (alternate primary)	49.2	gal	No Limit requested (exhausts with process)		negligible	N/A
	DLL Drying Line 102B														
		Cased Tobacco	5	tons/hr	5	Cased Tobacco	5	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Division for Air Quality

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DEP7007N

Source Emissions Profile

- [Section N.1: Emission Summary](#)
[Section N.2: Stack Information](#)
[Section N.3: Fugitive Information](#)
[Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

___ Complete DEP7007AI

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: May 2026

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions		
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)	
02 (102)	Dry Flour Drying Process																
		Fluidized Bed Drying Line 102A															
		DF0201	Fluidized Bed Dryer	Cyclone	CY0201	02-AE-01	5.0	PM	4.000	Engr. Est.	100%	75%	20.00	5.00	87.60	5.62	
		BH0201	Fluidized Bed Dryer Dust Return	Dust Collector	BH0201	02-AE-02	5.0	PM	0.429	Engr. Est.	100%	96%	2.14	0.09	9.39	0.10	
		BH0202	Conveyors, Sifting, Tote Filling, and Surge Silo	Global Dust Collector	BH0202	02-AE-03	5.0	PM	1.371	Engr. Est.	100%	90%	6.86	0.69	30.03	0.77	
		SI0201 SI0202	Silo Filling	Dust Collector	BH0204	02-AE-05	5.0	PM	0.513	Engr. Est.	100%	96%	2.57	0.10	11.24	0.12	
		TP0201	Truck Filling	Dust Collector	BH0204	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	
		DLL Drying Line 102B															
		DA0201	DLL Dryer	Dust Collector	CY0202	02-AE-06	5.0	PM	1.000	Engr. Est.	100%	75%	5.00	1.25	21.90	1.41	
		BH0205	Conveyors, Sifting, Tote Filling, and Surge Silo	Dust Collector	BH0205	02-AE-07	5.0	PM	1.371	Engr. Est.	100%	90%	6.86	0.69	30.03	0.77	
		SI0203 SI0204	Silo Filling	Dust Collector	BH0207	02-AE-09	5.0	PM	0.513	Engr. Est.	100%	96%	2.57	0.10	11.24	0.12	
		TP0202	Truck Filling	Dust Collector	BH0207	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	

Division for Air Quality

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DEP7007N

Source Emissions Profile

- [Section N.1: Emission Summary](#)
[Section N.2: Stack Information](#)
[Section N.3: Fugitive Information](#)
[Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

___ Complete DEP7007AI

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: May 2026

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
02 (102)	Dry Flour Drying Process															
		Fluidized Bed Drying Line 102A														
		DF0201	Fluidized Bed Dryer			02-AE-01	5.0	VOC	2.100	Engr. Est.			10.50	10.50	45.99	11.80
		BH0201	Fluidized Bed Dryer Dust Return			02-AE-02	5.0	VOC	0.039	Engr. Est.			0.20	0.20	0.86	0.22
		BH0202	Conveyors, Sifting, Tote Filling, and Surge Silo			02-AE-03	5.0	VOC	0.169	Engr. Est.			0.84	0.84	3.69	0.95
		SI0201 SI0202	Silo Filling			02-AE-05	5.0	VOC	0.017	Engr. Est.			0.08	0.08	0.37	0.09
		TP0201	Truck Filling			shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos
		DLL Drying Line 102B														
		DA0201	DLL Dryer			02-AE-06	5.0	VOC	0.308	Engr. Est.			1.54	1.54	6.75	1.73
		BH0205	Conveyors, Sifting, Tote Filling, and Surge Silo			02-AE-07	5.0	VOC	0.169	Engr. Est.			0.84	0.84	3.69	0.95
		SI0203 SI0204	Silo Filling			02-AE-09	5.0	VOC	0.017	Engr. Est.			0.08	0.08	0.37	0.09
		TP0202	Truck Filling			shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos	shared with silos

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007N Source Emissions Profile Section N.1: Emission Summary Section N.2: Stack Information Section N.3: Fugitive Information Section N.4: Notes, Comments, and Explanations	Additional Documentation ___ Complete DEP7007AI
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Source Name:	U.S. Smokeless Tobacco Company - Eagle One Facility
KY EIS (AFS) #:	21-
Permit #:	V-20-002
Agency Interest (AI) ID:	121768
Date:	May 2026

N.1: Emission Summary																		
Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions			
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)		
02 (102)	Dry Flour Drying Process																	
		Fluidized Bed Drying Line 102A																
		DF0201	Fluidized Bed Dryer			02-AE-01	5.0	NOx	0.128	Engr. Est.			0.64	0.64	2.80	0.72		
							5.0	CO	0.076	Engr. Est.			0.38	0.38	1.66	0.42		
							5.0	NH3	0.325	Engr. Est.			1.63	1.63	7.12	1.83		
		DLL Drying Line 102B																
		DA0201	DLL Dryer			02-AE-06	5.0	NH3	0.325	Engr. Est.			1.63	1.63	7.12	1.83		

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter <i>(ft)</i>	Height <i>(ft)</i>	Base Elevation <i>(ft)</i>	Northing <i>(m)</i>	Easting <i>(m)</i>	Flowrate <i>(acfm)</i>	Temperature <i>(° F)</i>	Exit Velocity <i>(ft/sec)</i>
Fluidized Bed Drying Line 102A									
02-AE-01	Process: DF0201 Control: CY0201	3.00	59	0			26,625	200	62.78
02-AE-02	Process: BH0201 Control: BH0201	1.20	12	0			500	200	7.37
02-AE-03	Process: BH0202 Control: BH0202	2.30	17	0			4,000	75	16.05
02-AE-05	Process: SI0201, SI0202 Control: BH0204	0.83	12	0			500	75	15.28
02-AE-05	Process: TP0201 Control: BH0204	included above	included above	included above			included above	included above	included above
DLL Drying Line 102B									
02-AE-06	Process: DA0201 Control: DA0201	2.50	59	0			5,445	115	18.49
02-AE-07	Process: BH0205 Control: BH0205	2.30	17	0			4,000	75	16.05
02-AE-09	Process: SI0203, SI0204 Control: BH0207	0.83	12	0			500	75	15.28
02-AE-09	Process: TP0202 Control: BH0207	included above	included above	included above			included above	included above	included above

Section N.4: Notes, Comments, and Explanations

EU02, DLL Drying Line 102B, is limited in the permit to 11,241 tons per year of total tobacco.

EU02, Fluidized Bed Drying Line 102A, is limited in the permit to 11,241 tons per year of total tobacco.

These are the throughputs used in the annual PTE calculations.

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

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DEP7007GG

Control Equipment

Additional Documentation

- ___ Complete Sections GG.1 through GG.12, as applicable
- ___ Attach manufacturer's specifications for each control device
- ___ Complete DEP7007AI

Source Name: [Emission Unit 02 \(102\) Dry Flour Drying Process](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)

Agency Interest (AI) ID: [121768](#)

Date: [May 2026](#)

Section GG.1: General Information - Control Equipment

Control Device ID #	Control Device Name	Cost	Manufacturer	Model Name/ Serial #	Date Installed	Inlet Gas Stream Data For <u>All</u> Control Devices					Inlet Gas Stream Data For Condensers, Adsorbers, Afterburners, Incinerators, Oxidizers <u>Only</u>			Equipment Operational Data For <u>All</u> Control Devices		
						Temperature ([°] F)	Flowrate (scfm @ 68 [°] F)	Average Particle Diameter (μm)	Particle Density (lb/ft ³) or Specific Gravity	Gas Density (lb/ft ³)	Gas Moisture Content (%)	Gas Composition	Fan Type	Pressure Drop Range (in. H ₂ O)	Pollutants Collected/ Controlled	Pollutant Removal (%)
CY0201	Cyclone		Fisher Klosterman	XQ240-26-2	2015	200	21,300	< 100 um est.		0.073 (air)				manufacturer recommendation	PM	75%
BH0201	Dust Collector		Schenck Process, LLC	54AVR21 STY III FLTR	2015	200	400	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	96%
BH0202	Global Dust Collector		Schenck Process, LLC	3M2F12 MAC2FLO	2015	75	4,000	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	90%
BH0204	Dust Collector		Schenck Process, LLC	54AVR21 STY III FLTR	2015	75	500	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	96%
CY0202	Dust Collector		Garbuio Dickinson	Twin Cyclone (620 DIA)	2015	115	5,000	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	75%
BH0205	Dust Collector		Schenck Process, LLC	3M2F12 MAC2FLO	2015	75	4,000	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	90%
BH0207	Dust Collector		Schenck Process, LLC	54AVR21 STY III FLTR	2015	75	500	< 100 um est.		0.075 (air)				manufacturer recommendation	PM	96%

Section GG.3: Cyclone											
Control Device ID #	Identify all Emission Units and Control Devices that Feed to Cyclone	Identify Number of Cyclones: Single <u>or</u> Multiple	Identify Type: High-Efficiency, Conventional, <u>or</u> High-Throughput	Inlet Height (ft)	Inlet Width (ft)	Bottom Cone Height (ft)	Body Height (ft)	Body Diameter (ft)	Dust Outlet Tube Diameter (ft)	Gas Outlet Tube Diameter (ft)	Vortex Finder Height (ft)
CY0201	Fluidized Bed Dryer	Single	High Efficiency								
CY0202	DLL Dryer	Dual	High Efficiency								

Section GG.6: Filter														
Control Device ID #	Identify all Emission Units and Control Devices that Feed to Filter	Identify Type of Filter Unit: Baghouse, Cartridge Collector, or Other (specify)	Identify Type of Filtering Material: Fabric, Paper, Synthetic, or Other (specify)	Total Filter Area (ft ²)	Effective Air-to-Filter Ratio (acfm/ft ²)	Continuous Monitoring Instrumentation (e.g. COMS, BLDS, none)	Additional Materials Introduced into the Control System (e.g. lime, carbon)		Identify Cleaning Method: Shaker, Pulse Air, Reverse Air, Pulse Jet, or Other (specify)	Identify Gas Cooling Method: Ductwork, Heat Exchanger, Bleed-in Air, Water Spray, or Other (specify)	For Ductwork:		For Bleed-in Air:	For Water Spray:
							Material	Injection Rate (lb/hr)			Length (ft)	Diameter (ft)	Flowrate (scfm @ 68°F)	Flowrate (gal/min)
BH0201	Fluidized Bed Dryer Dust Return	Baghouse	bags	187.53	2.1	None	N/A	N/A	Reverse Air	N/A				
BH0202	102A Conveyors, Sifting, Tote Filling, and Surge Silo	Cartridge Collector	Non-woven polyester nanofiber cartridges	3,048	1.3	None	N/A	N/A	Reverse Air	N/A				
BH0204	102A Silos or Truck Filling	Baghouse	bags	187.53	2.7	None	N/A	N/A	Reverse Air	N/A				
BH0205	102B Conveyors, Sifting, Tote Filling, and Surge Silo	Cartridge Collector	Non-woven polyester nanofiber cartridges	3,048	1.3	None	N/A	N/A	Reverse Air	N/A				
BH0207	102B Silos or Truck Filling	Baghouse	bags	187.53	2.7	None	N/A	N/A	Reverse Air	N/A				

DEP7007V

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
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Applicable Requirements and Compliance Activities

- ☐ Section V.1: Emission and Operating Limitation(s)
- ☐ Section V.2: Monitoring Requirements
- ☐ Section V.3: Recordkeeping Requirements
- ☐ Section V.4: Reporting Requirements
- ☐ Section V.5: Testing Requirements
- ☒ ~~Section V.6: Notes, Comments, and Explanations~~

Additional Documentation

___ Complete DEP7007AI

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: April 2025

Section V.1: Emission and Operating Limitation(s)

Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
102A 102B	Fluidized Bed Drying Line DLL Drying Line	59:010 Section 3(2)	PM	PM (lb/hr) = $3.59 \times P^{0.62}$ (P = Hourly Processing Weight in tons/hr)			Emission Factor, Maximum Rated Capacity of the equipment, and Control Devices operating
		Permit condition	Throughput			11,241 tons tobacco/year/line	Monthly and 12-Month Rolling Throughput records
		59:010 Section 3 (1)(a)	Opacity	20%			
		Permit condition	VOC	Part of site-wide limit under Section D			Formulas in Section D

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
102A 102B	Fluidized Bed Drying Line DLL Drying Line	PM	59:010 Section 3(2)	Operation	The control devices automatically turn on when the underlying processes are started.
		Throughput	Permit Condition	Operation	Production Records
		Opacity			Monthly visual observations (requested change to permit) Weekly visual observations

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
102A 102B	Fluidized Bed Drying Line DLL Drying Line	PM	Permit Condition	Production and Emission Rate	Production throughputs are totaled each month and used to calculate average hourly emissions
		Throughput	Permit Condition	Production	Production throughputs are totaled each month
		Opacity	None	Visual observations	Log of all qualitative visual observations of emissions from each stack, any corrective actions taken and any U.S. EPA Reference Method 9 readings performed

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
102A 102B	Fluidized Bed Drying Line DLL Drying Line	PM	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals
		Throughput	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals
		Opacity	None	None	None

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
102A 102B	Fluidized Bed Drying Line DLL Drying Line	PM	None	None	None
		Throughput	None	None	None
		Opacity	None	None	None

Tobacco Curing Operation

Eagle One Facility
U.S. Smokeless Tobacco Company
Hopkinsville, KY

Emission Units

- ♦ Emission Unit 03 (103): Into Cure Process –
Process Description, Process Flow Diagram, and Forms DEP7007B,
DEP7007N, and DEP7007V

- ♦ Emission Unit 04 (104): Curing Process –
Process Description, Process Flow Diagram, and Forms DEP7007B,
DEP7007N, and DEP7007V

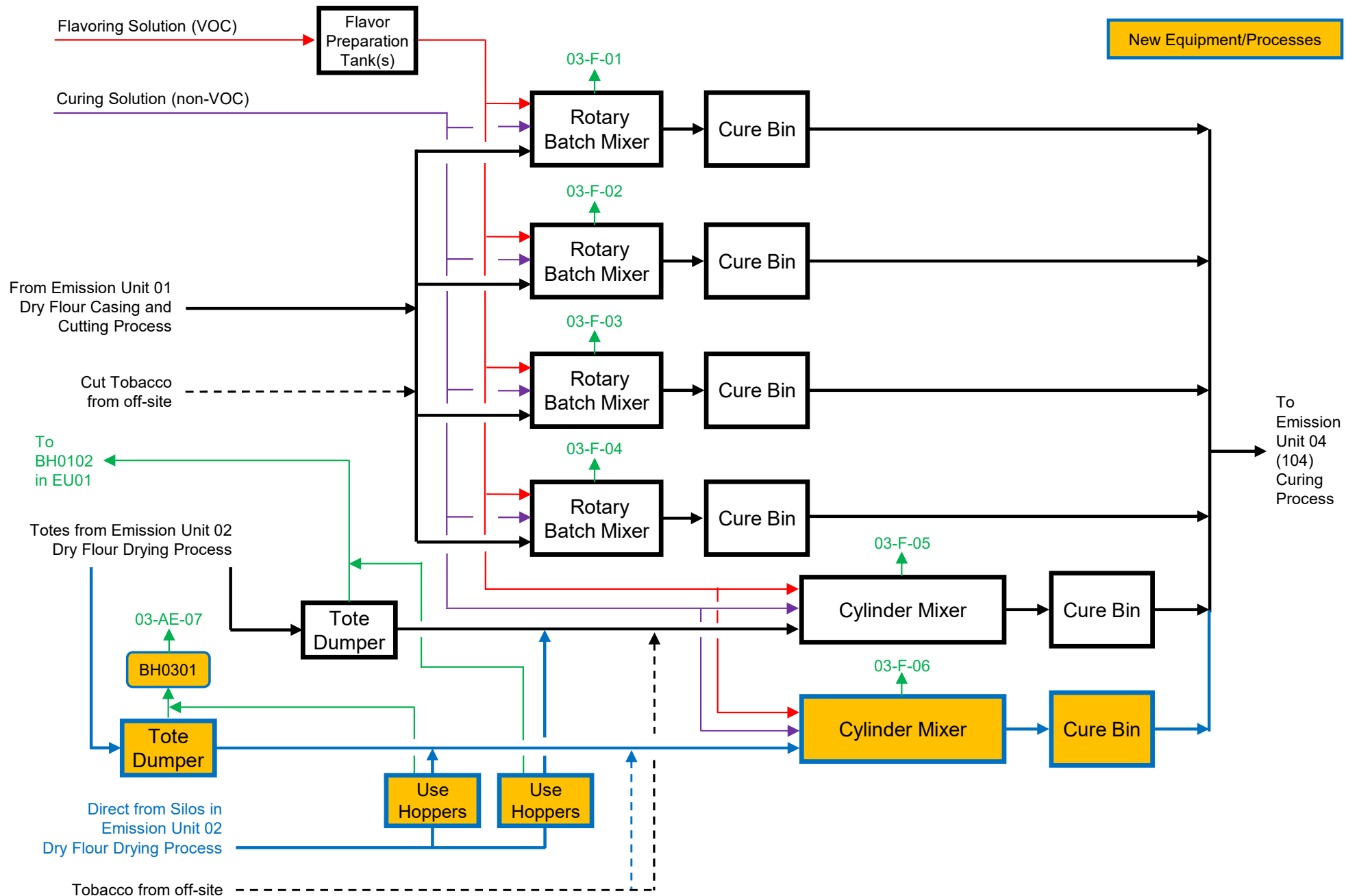
Tobacco Curing Operation Process Description

The Tobacco Curing Operation consists of Emission Unit 03 (103) Into Cure Process described below and Emission Unit 04 (104) Curing Process described in the next section.

EMISSION UNIT 03 (103) INTO CURE PROCESS

The Into Cure Process involves mixing Dry Flour tobacco with a curing solution and a flavor solution in batch mixers. Cased and cut tobacco enters this process from Emission Unit 01 (101) Dry Flour Casing and Cutting, from Emission Unit 02 (102) Dry Flour Drying Process, or from other USSTC facilities.

There are currently four batch mixers that receive cased and cut tobacco. There is also a cylinder mixer to allow for mixing of low moisture Dry Flour tobacco produced in Emission Unit 02 with a curing solution and a flavor solution. A second low moisture cylinder mixer will be added along with tote dumpers and use hoppers to feed the low moisture cylinder mixers. Once tobacco enters into each mixer, curing and flavor solution is applied. After the application of the curing and flavor solution, the mixture is transferred into cure bins, which are used to store the mixture in the cure room. VOC emissions from the Into Cure Process occur during the addition of the flavor solution, which may contain ethanol. A portion of the ethanol in the flavor solution flashes during the application process. A process flow diagram for the Emission Unit 03 (103) Into Cure Process is provided as **Figure 5**.



Division for Air Quality

300 Sower Boulevard
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DEP7007B

Manufacturing or Processing Operations

- Section B.1: Process Information
Section B.2: Materials and Fuel Information
~~Section B.3: Notes, Comments, and Explanations~~

Additional Documentation

- Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
Attach a flow diagram
Attach SDS

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: April 2025

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process Continuous or Batch?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
03 (103)	Into Cure Process	see process description	03-F-01 03-F-02 03-F-03 03-F-04	Four Rotary Batch Mixers			2015	Batch		
			03-F-05 03-F-06	Two Cylinder Mixers			2015, 2027	Batch		
			TD0301 UH0301	Tote Dumper, Use Hoppers			2027			
			TD0302 UH0302	Tote Dumper, Use Hoppers			2027			
			included in above	One or more 60 gallon blending/storage tanks for tobacco flavor solution			2015	Batch		

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
03 (103)	Into Cure Process	Tobacco	13.75	tons/hr	N/A	Tobacco Mixture (into cure tobacco)	22.1	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Curing Solution, Flavors (ethanol)	148.0	lbs/hr (ethanol)	N/A	included in above	included in above	included in above	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007N Source Emissions Profile __ Section N.1: Emission Summary __ Section N.2: Stack Information __ Section N.3: Fugitive Information __ Section N.4: Notes, Comments, and Explanations	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center; padding: 5px;">Additional Documentation</td> </tr> <tr> <td style="padding: 10px;"> __ Complete DEP7007AI </td> </tr> </table>	Additional Documentation	__ Complete DEP7007AI
Additional Documentation				
__ Complete DEP7007AI				

Source Name:	U.S. Smokeless Tobacco Company - Eagle One Facility
KY EIS (AFS) #:	21-
Permit #:	V-20-002
Agency Interest (AI) ID:	121768
Date:	May 2026

N.1: Emission Summary																
Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
03 (103)	Into Cure Process	TD0301 UH0301	Tote Dumper Use Hopper	Dust Collector (included in EU01)	BH0102 (included in EU01)	01-AE-04 (included in EU01)	3.75	PM	0.229	Engr. Est.	100%	90%	0.857	0.086	3.75	0.34
		TD0302 UH0302	Tote Dumper Use Hopper	Dust Collector	BH0301	03-AE-02	3.75	PM	0.229	Engr. Est.	100%	90%	0.857	0.086	3.75	0.34

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999				DEP7007N Source Emissions Profile __ Section N.1: Emission Summary __ Section N.2: Stack Information __ Section N.3: Fugitive Information __ Section N.4: Notes, Comments, and Explanations										Additional Documentation __ Complete DEP7007AI							
Source Name:				U.S. Smokeless Tobacco Company - Eagle One Facility																	
KY EIS (AFS) #:				21-																	
Permit #:				V-20-002																	
Agency Interest (AI) ID:				121768																	
Date:				April 2025																	
N.1: Emission Summary																					
Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions						
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)					
03 (103)	Into Cure Process	03-F-01 03-F-02 03-F-03 03-F-04	Four Rotary Batch Mixers			03-F-01 03-F-02 03-F-03 03-F-04	22.09	VOC	3.116	Engr. Est.					68.82	68.82	301.4	46.70			
		03-F-05	Two Cylinder Mixers			03-F-05	included in above	included in above	included in above	included in above					included in above	included in above	included in above	included in above			
		included in above	One or more 60 gallon blending/storage tanks for tobacco flavor solution				included in above	included in above	included in above	included in above					included in above	included in above	included in above	included in above			

Section N.2: Stack Information
UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (° F)	Exit Velocity (ft/sec)
03-AE-07	Tote Dumper Use Hopper	0.83	12	0.00			500	Ambient	15.28

Section N.3: Fugitive Information								
UTM Zone:								
Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)
03 (103)	Into Cure Process	03-F-01 03-F-02 03-F-03 03-F-04					Ambient	9
		03-F-05 03-F-06					Ambient	4

Section N.4: Notes, Comments, and Explanations

EU0103 is limited in the permit to 29,976 tons per year of total tobacco. This number is used to calculate the controlled potential emissions.

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

DEP7007GG

Control Equipment

Additional Documentation

- ___ Complete Sections GG.1 through GG.12, as applicable
- ___ Attach manufacturer's specifications for each control device
- ___ Complete DEP7007AI

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002Agency Interest (AI) ID: 121768Date: May 2026

Section GG.1: General Information - Control Equipment

Control Device ID #	Control Device Name	Cost	Manufacturer	Model Name/ Serial #	Date Installed	Inlet Gas Stream Data For <u>All</u> Control Devices					Inlet Gas Stream Data For Condensers, Adsorbers, Afterburners, Incinerators, Oxidizers <u>Only</u>			Equipment Operational Data For <u>All</u> Control Devices		
						Temperature ($^{\circ}F$)	Flowrate (scfm @ 68 $^{\circ}F$)	Average Particle Diameter (μm)	Particle Density (lb/ft ³) or Specific Gravity	Gas Density (lb/ft ³)	Gas Moisture Content (%)	Gas Composition	Fan Type	Pressure Drop Range (in. H ₂ O)	Pollutants Collected/ Controlled	Pollutant Removal (%)
BH0301	Dust Collector		TBD	TBD	2027	75	500	< 100 μm est.		0.075 (air)				manufacturer recommendation	PM	96%

Section GG.6: Filter														
Control Device ID #	Identify all Emission Units and Control Devices that Feed to Filter	Identify Type of Filter Unit: Baghouse, Cartridge Collector, or Other (specify)	Identify Type of Filtering Material: Fabric, Paper, Synthetic, or Other (specify)	Total Filter Area (ft ²)	Effective Air-to-Filter Ratio (acfm/ft ²)	Continuous Monitoring Instrumentation (e.g. COMS, BLDS, none)	Additional Materials Introduced into the Control System (e.g. lime, carbon)		Identify Cleaning Method: Shaker, Pulse Air, Reverse Air, Pulse Jet, or Other (specify)	Identify Gas Cooling Method: Ductwork, Heat Exchanger, Bleed-in Air, Water Spray, or Other (specify)	For Ductwork:		For Bleed-in Air:	For Water Spray:
							Material	Injection Rate (lb/hr)			Length (ft)	Diameter (ft)	Flowrate (scfm @ 68 °F)	Flowrate (gal/min)
BH0301	Tote Dumper and Use Hoppers	Baghouse	bags	188	2.7	None	N/A	N/A	Reverse Air	N/A				

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities ___ Section V.1: Emission and Operating Limitation(s) ___ Section V.2: Monitoring Requirements ___ Section V.3: Recordkeeping Requirements ___ Section V.4: Reporting Requirements ___ Section V.5: Testing Requirements ___ Section V.6: Notes, Comments, and Explanations	Additional Documentation ___ Complete DEP7007AI
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Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: April 2025

Section V.1: Emission and Operating Limitation(s)

Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
103	Into Cure Process	Permit condition	Throughput			29,967 tons total tobacco/year	Monthly and 12-Month Rolling Throughput records
		59:010 Section 3(2)	PM	PM (lb/hr) = 3.59*P ^{0.62} (P = Hourly Processing Weight in tons/hr)			Emission Factor, Maximum Rated Capacity of the equipment, and Control Devices operating
		Permit condition	VOC	Part of site-wide limit under Section D			Formulas in Section D

Section V.2: Monitoring Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
103	Into Cure Process	Throughput	Permit Condition	Operation	Production Records
		PM	59:010 Section 3(2)	Operation	The control devices automatically turn on when the underlying processes are started.

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
103	Into Cure Process	Throughput	Permit Condition	Production	Production throughputs are totaled each month
		PM	Permit Condition	Production and Emission Rate	Production throughputs are totaled each month and used to calculate average hourly emissions

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
103	Into Cure Process	Throughput	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals
		PM	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
103	Into Cure Process	Throughput	None	None	None
		PM	None	None	None

Tobacco Curing Operation Process Description

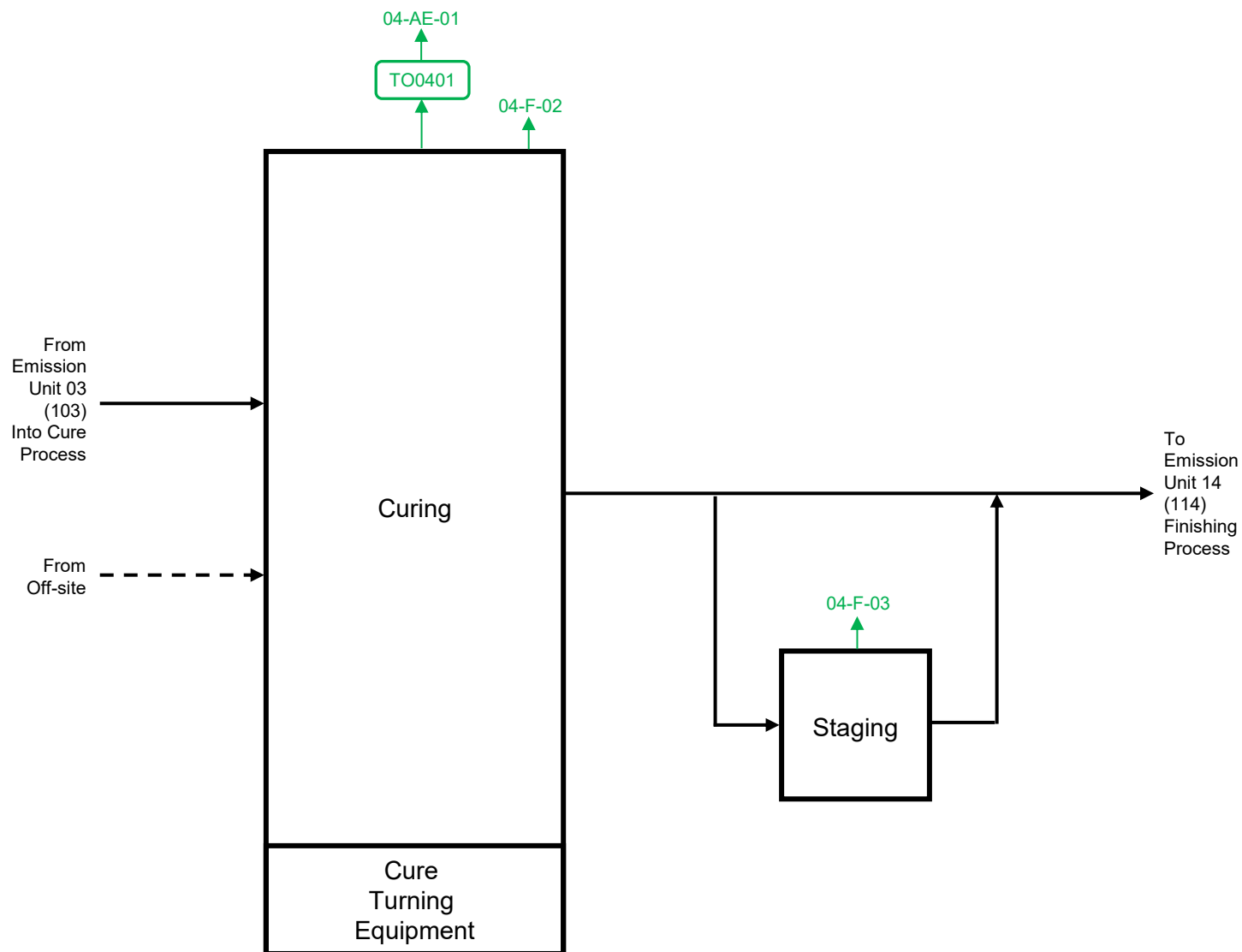
The Tobacco Curing Operation consists of Emission Unit 03 (103) Into Cure Process described in the previous section and Emission Unit 04 (104) Curing Process described below.

EMISSION UNIT 04 (104) CURING PROCESS

There are no changes planned that impact Emission Unit 04. For reference, the process is described below.

The Curing Process consists of a cure room and a cure turning room. Cure bins, containing tobacco with curing and flavoring solution, come from Emission Unit 03 (103) Into Cure Process or are brought in from other USSTC facilities and are placed in the cure room. The cure turning room consists of cure turning stations, each consisting of a cure bin dumper, a lump breaker, and conveyors. At periodic intervals during the cure process, the cure bins are turned in the cure turning room and then returned to the cure room. During that time ethanol and other tobacco volatiles are emitted continuously and slowly as the tobacco cures. The cure rooms and the cure turning room are enclosed and the air space is vented to atmosphere or to a regenerative thermal oxidizer (TO0401) for odor control (if needed).

Once the tobacco is finished curing, it is removed from the cure room and either transferred to Emission Unit 14 (114) Tobacco Finishing Process. Cure bins may need to be staged prior to transfer to the finishing process. Cures continue to emit a small amount of VOC as they are removed from the cure rooms. A process flow diagram for Emission Unit 04 (104) Curing Process is provided as **Figure 6**.



DEP7007B

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

Manufacturing or Processing Operations

- Section B.1: Process Information
Section B.2: Materials and Fuel Information
~~Section B.3: Notes, Comments, and Explanations~~

Additional Documentation

- Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
Attach a flow diagram
Attach SDS

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: May 2026

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process Continuous or Batch?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
04 (104)	Curing Process	see process description	04-AE-01 04-F-02 04-F-03	Cure Room, Turning Stations (Cure Bin Dumper, Lump Breaker & Conveyors), and a Staging Area			2015, 2027	Batch		

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
04 (104)	Curing Process	Moist Tobacco in Cure Rooms	1,400	Cure Spaces		Cured Tobacco	30	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		Moist Tobacco in Cure Turning	30	tons/hr combined											

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007N Source Emissions Profile ☐ Section N.1: Emission Summary ☐ Section N.2: Stack Information ☐ Section N.3: Fugitive Information ☐ Section N.4: Notes, Comments, and Explanations	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center; padding: 5px;">Additional Documentation</td> </tr> <tr> <td style="padding: 10px;"> ☐ Complete DEP7007AI </td> </tr> </table>	Additional Documentation	☐ Complete DEP7007AI
Additional Documentation				
☐ Complete DEP7007AI				

Source Name:	<u>U.S. Smokeless Tobacco Company - Eagle One Facility</u>
KY EIS (AFS) #:	21-_____
Permit #:	<u>V-20-002</u>
Agency Interest (AI) ID:	<u>121768</u>
Date:	<u>May 2026</u>

N.1: Emission Summary																
Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
04 (104)	Curing Process	04-AE-01	Cure Room,			04-AE-01 04-F-02 04-F-03	3.42	VOC	4.093	Engr. Est.			14.01	14.01	61.35	61.35
		04-F-02	Cure Bin				3.42	NOx	3.286	Engr. Est.			11.25	11.25	49.25	49.25
		04-F-03	Dumper,				3.42	CO	0.079	Engr. Est.			0.27	0.27	1.19	1.19
			Turning Stations				3.42	Acetaldehyde	0.003	Engr. Est.			0.01	0.01	0.04	0.04
			Lump Breaker				3.42	Formaldehyde	0.011	Engr. Est.			0.04	0.04	0.16	0.16
			& Conveyors,				3.42	Total HAPs	0.013	Engr. Est.			0.05	0.05	0.20	0.20
		oxidizer	TO0401				3.42	NH3	5.938	Engr. Est.	20%	98%	4.06	0.08	17.80	0.36
		uncaptured	uncaptured				3.42	NH3	5.938	Engr. Est.	80%		16.26	16.26	71.20	71.20

Section N.2: Stack Information									
UTM Zone:									
Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (°F)	Exit Velocity (ft/sec)
04-AE-01	Process: EU04 Control: TO0401	3.75	45	0			21,300	160	32.15

Section N.3: Fugitive Information
UTM Zone:

Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)
04-F-02	Curing / Cure Turning	Process: EU04					100	35
04-F-03	Staging	Process: EU04					ambient	35

Section N.4: Notes, Comments, and Explanations

EU04 is limited in the permit to 29,976 tons per year of total tobacco. This number is used to calculate the controlled potential emissions.

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

DEP7007GG

Control Equipment

Additional Documentation

- ___ Complete Sections GG.1 through GG.12, as applicable
- ___ Attach manufacturer's specifications for each control device
- ___ Complete DEP7007AI

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: May 2026

Section GG.1: General Information - Control Equipment

Control Device ID #	Control Device Name	Cost	Manufacturer	Model Name/ Serial #	Date Installed	Inlet Gas Stream Data For <u>All</u> Control Devices					Inlet Gas Stream Data For Condensers, Adsorbers, Afterburners, Incinerators, Oxidizers <u>Only</u>			Equipment Operational Data For <u>All</u> Control Devices		
						Temperature (*F)	Flowrate (scfm @ 68 *F)	Average Particle Diameter (μm)	Particle Density (lb/ft ³) or Specific Gravity	Gas Density (lb/ft ³)	Gas Moisture Content (%)	Gas Composition	Fan Type	Pressure Drop Range (in. H ₂ O)	Pollutants Collected/ Controlled	Pollutant Removal (%)
TO0401	Regenerative thermal oxidizer	\$552,100	Durr	Ecopure RL	2015	92 F	17,410	N/A	N/A	0.075 (air)	ambinet	air with minimal VOC and ammonia	forced draft	manufacturer recommendations	Odor	N/A
															Ammonia	98% (20% capture)

Section GG.7: Afterburner/Incinerator/Oxidizer																
Control Device ID #	Identify all Emission Units and Control Devices that Feed to Afterburner/Incinerator/ Oxidizer	Identify Type: Afterburner, Incinerator, Oxidizer, or Other (specify)	Number of Burners	Burner Rating (BTU/hr)	Dimensions of Combustion Chamber (specify units)	Residence Time (sec)	Combustion Chamber Temperature (°F)	Type of Catalyst (if applicable)	Type of Heat Exchanger (if applicable)	Auxiliary Fuel						Composition and Quantities of Combusted Waste
										Identify Fuel Type	Higher Heating Value (MMBtu/scf)	Hourly Fuel Usage (scf/hr)	% Sulfur (Maximum)	% Sulfur (Average)	% Ash (Maximum)	
TO0401	04 (104) Curing Process	RTO	1	3.30E+06	Diameter 14' Height 9' 8"		1,550 F (or lower if stack tested)	N/A	ceramic media	Propane	91,500 Btu/gal	36.07 gals/hr				
										Natural Gas	1,020 Btu/scf	3235 scf/hr				

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities ___ Section V.1: Emission and Operating Limitation(s) ___ Section V.2: Monitoring Requirements ___ Section V.3: Recordkeeping Requirements ___ Section V.4: Reporting Requirements ___ Section V.5: Testing Requirements ___ Section V.6: Notes, Comments, and Explanations	Additional Documentation ___ Complete DEP7007AI					
Source Name: Emission Unit 04 (104) Cure Process KY EIS (AFS) #: 21- Permit #: V-20-002 Agency Interest (AI) ID: 121768 Date: May 2026							
Section V.1: Emission and Operating Limitation(s)							
Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
104	Cure Process	Permit condition	Throughput			29,967 tons total tobacco/year	Monthly and 12-Month Rolling Throughput records
		Permit condition	VOC	Part of site-wide limit under Section D			Formulas in Section D

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
104	Cure Process	Throughput	Permit Condition	Operation	Production Records

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
104	Cure Process	Throughput	Permit Condition	Production	Production throughputs are totaled each month

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
104	Cure Process	Throughput	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
104	Cure Process	Throughput	None	None	None

Support Operations

Eagle One Facility
U.S. Smokeless Tobacco Company
Hopkinsville, KY

Existing Emission Units

- ♦ Emission Unit 05 (105) Boiler 1 and Emission Unit 06 (106) Boiler 2 - Forms DEP7007A, DEP7007N, and Form DEP7007V
- ♦ Emission Unit 12 (112) Pesticide Fogging Forms - Forms DEP7007B, DEP7007N, and DEP7007V
- ♦ Emission Unit 13 (113) Emergency Fire Pump - Forms DEP7007A, DEP7007N, and DEP7007V

New Emission Units

- ♦ Emission Unit 16 (116) 25 kWe Emergency Generator - Forms DEP7007A, DEP7007N, and DEP7007V
- ♦ Emission Unit 17 (117) 100 kWe Emergency Generator - Forms DEP7007A, DEP7007N, and DEP7007V

Support Operations Process Description

Fuel Burning Units

Support equipment at the facility includes two boilers (Emission Unit 05 and Emission Unit 06) and a diesel fire pump (Emission Unit 13).

Boilers

The boilers are 32.659 MMBtu/hr boilers (800 horsepower) that fire natural gas as a primary fuel and propane as an alternate primary fuel. The boilers supply steam to the process and provide steam for building space conditioning.

Diesel Engines

The facility has a diesel-fired emergency fire pump.

Natural Gas Fired Engines

The facility is adding two emergency generators which will use natural gas fuel.

Pesticide Operations

Occasionally, pesticide fogging (Emission Unit 12) is conducted in select areas of the site to control pests that would possibly destroy the tobacco product.

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007A**Indirect Heat Exchangers and Turbines**

- ___ Section A.1: General Information
___ Section A.2: Operating and Fuel Information
___ Section A.3: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI, DEP7007N,
DEP7007V, and DEP7007GG.

___ Manufacturer's specifications

Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: [21-](#)

Permit #: [V-20-002](#)

Agency Interest (AI) ID: [121768](#)

Date: [May 2026](#)

Section A.1: General Information

Emission Unit #	Emission Unit Name	Process ID	Process Name	Identify General Type: Indirect Heat Exchanger, Gas Turbine, or Combustion Turbine	Indirect Heat Exchanger Configuration	Manufacturer	Model No./ Serial No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	SCC Code	SCC Units	Control Device ID	Stack ID
05 (105) 06 (106)	Boiler 1 Boiler 2	05 06		Indirect Heat Exchanger		Cleaver-Brooks	CBEX-E 700-800-200ST	2015	10200602 (natural gas)	million cubic feet	N/A	05-AE-01 06-AE-01
									10201002 (propane)	thousands of gallons	N/A	05-AE-01 06-AE-01

Section A.2: Operating and Fuel Information

Emission Unit #	If multipurpose unit, identify the percentage of use by purpose				Rated Capacity Heat Input (MMBTU/hr)	Rated Capacity Power Output		Describe Operating Scenario (only if this unit will be used in different configurations)	Classify Fuel as Primary or Secondary	Identify Fuel Type: Coal, Natural Gas, Wood, Biomass, Landfill/Digester Gas, Fuel Oil # (specify 1-6), or Other	Heat Content (HHV)		Maximum Operating Hours	Ash Content (%)	Sulfur Content (%)
	Space Heat	Process Heat	Power	Emergency			(Specify units: hp, MW, or lb steam/hr)					(Specify units: Btu/lb, Btu/gal, or Btu/scf)			
105 106	20%	80%			32.659	800	hp		Primary fuel	Natural Gas	1,020	Btu/scf	8,760	N/A	N/A
									Alternate primary fuel	Propane	91,500	Btu/gal	8,760	N/A	N/A

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999						DEP7007N Source Emissions Profile Section N.1: Emission Summary Section N.2: Stack Information Section N.3: Fugitive Information Section N.4: Notes, Comments, and Explanations										Additional Documentation ___ Complete DEP7007AI			
Source Name:						U.S. Smokeless Tobacco Company - Eagle One Facility													
KY EIS (AFS) #:						21-													
Permit #:						V-20-002													
Agency Interest (AI) ID:						121768													
Date:						May 2026													
N.1: Emission Summary																			
Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions				
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)			
05 (105) 06 (106)	Boiler 1 Boiler 2	05 06	Natural Gas	N/A	N/A	05-AE-01 06-AE-01	0.032	PM, PM10, PM2.5	13.77	Manufacturer spec	N/A	N/A	0.00	0.00	0.00	0.00			
								SO2	0.61	Manufacturer spec	N/A	N/A	0.00	0.00	0.00	0.00			
								NOx	35.7	Manufacturer spec	N/A	N/A	0.00	0.00	0.00	0.00			
								CO	7.65	Manufacturer spec	N/A	N/A	0.00	0.00	0.00	0.00			
								VOC	3.88	Manufacturer spec	N/A	N/A	0.00	0.00	0.00	0.00			
								CO2e	120,307	40 CFR 98 Sub.C	N/A	N/A	0	0	0	0			
05 (105) 06 (106)	Boiler 1 Boiler 2	05 06	Propane	N/A	N/A	05-AE-01 06-AE-01	0.357	PM, PM10, PM2.5	0.7	AP-42 Section 1.5	N/A	N/A	0.25	0.25	1.09	1.09			
								SO2	0.055	AP-42 Section 1.5	N/A	N/A	0.02	0.02	0.09	0.09			
								NOx	13	AP-42 Section 1.5	N/A	N/A	4.64	4.64	20.32	20.32			
								CO	7.5	AP-42 Section 1.5	N/A	N/A	2.68	2.68	11.73	11.73			
								VOC	0.8	AP-42 Section 1.5	N/A	N/A	0.29	0.29	1.25	1.25			
								CO2e	12,570	40 CFR 98 Sub.C	N/A	N/A	4,487	4,487	19,651	19,651			
05 (105) 06 (106)	Boiler 1 Boiler 2	05 06	Maximum (natural gas or propane)					PM, PM10, PM2.5					0.25	0.25	1.09	1.09			
								SO2					0.02	0.02	0.09	0.09			
								NOx					4.64	4.64	20.32	20.32			
								CO					2.68	2.68	11.73	11.73			
								VOC					0.29	0.29	1.25	1.25			
								CO2e					4,487	4,487	19,651	19,651			

Section N.2: Stack Information
UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (° F)	Exit Velocity (ft/sec)
05-AE-01	Boiler 1 05 (105)	2	43	0			10,294	414	54.61
06-AE-01	Boiler 2 06 (106)	2	43	0			10,294	414	54.61

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities ☐ Section V.1: Emission and Operating Limitation(s) ☐ Section V.2: Monitoring Requirements ☐ Section V.3: Recordkeeping Requirements ☐ Section V.4: Reporting Requirements ☐ Section V.5: Testing Requirements ☒ Section V.6: Notes, Comments, and Explanations	Additional Documentation ☐ Complete DEP7007AI																																																								
Source Name: <u>U.S. Smokeless Tobacco Company - Eagle One Facility</u> KY EIS (AFS) #: 21- _____ Permit #: <u>V-20-002</u> Agency Interest (AI) ID: <u>121768</u> Date: <u>May 2026</u>																																																										
Section V.1: Emission and Operating Limitation(s) <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <thead> <tr> <th style="width: 10%;">Emission Unit #</th> <th style="width: 15%;">Emission Unit Description</th> <th style="width: 15%;">Applicable Regulation or Requirement</th> <th style="width: 10%;">Pollutant</th> <th style="width: 15%;">Emission Limit (if applicable)</th> <th style="width: 15%;">Voluntary Emission Limit or Exemption (if applicable)</th> <th style="width: 15%;">Operating Requirement or Limitation (if applicable)</th> <th style="width: 20%;">Method of Determining Compliance with the Emission and Operating Requirement(s)</th> </tr> </thead> <tbody> <tr> <td>05 (105) 06 (106)</td> <td>Boiler 1 Boiler 2</td> <td>59:015 Section 4(1)(c)</td> <td>PM</td> <td>0.36 lb/MMBtu</td> <td></td> <td></td> <td>Emission factor and maximum rated capacity of equipment</td> </tr> <tr> <td></td> <td></td> <td>59:015 Section 4(2)</td> <td>Opacity</td> <td>20%, except one 6-min period of 40% in one hour</td> <td></td> <td></td> <td>N/A</td> </tr> <tr> <td></td> <td></td> <td>59:015 Section 5(1)(c)</td> <td>SO2</td> <td>1.39 lb/MMBtu</td> <td></td> <td></td> <td>Emission factor and maximum rated capacity of equipment</td> </tr> <tr> <td></td> <td></td> <td>59:015, Section 7(1)</td> <td></td> <td></td> <td></td> <td>Startup and Shutdown</td> <td>Follow manufacturer's procedures</td> </tr> <tr> <td></td> <td></td> <td>Exempt from 40 CFR 63 Subpart JJJJJJ</td> <td>N/A</td> <td>N/A</td> <td></td> <td></td> <td>Meet definition of gas-fired boiler in 40 CFR 63.11237</td> </tr> <tr> <td></td> <td></td> <td>Permit condition</td> <td>VOC</td> <td>Part of site-wide limit under Section D</td> <td></td> <td></td> <td>Formulas in Section D</td> </tr> </tbody> </table>			Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)	05 (105) 06 (106)	Boiler 1 Boiler 2	59:015 Section 4(1)(c)	PM	0.36 lb/MMBtu			Emission factor and maximum rated capacity of equipment			59:015 Section 4(2)	Opacity	20%, except one 6-min period of 40% in one hour			N/A			59:015 Section 5(1)(c)	SO2	1.39 lb/MMBtu			Emission factor and maximum rated capacity of equipment			59:015, Section 7(1)				Startup and Shutdown	Follow manufacturer's procedures			Exempt from 40 CFR 63 Subpart JJJJJJ	N/A	N/A			Meet definition of gas-fired boiler in 40 CFR 63.11237			Permit condition	VOC	Part of site-wide limit under Section D			Formulas in Section D
Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)																																																			
05 (105) 06 (106)	Boiler 1 Boiler 2	59:015 Section 4(1)(c)	PM	0.36 lb/MMBtu			Emission factor and maximum rated capacity of equipment																																																			
		59:015 Section 4(2)	Opacity	20%, except one 6-min period of 40% in one hour			N/A																																																			
		59:015 Section 5(1)(c)	SO2	1.39 lb/MMBtu			Emission factor and maximum rated capacity of equipment																																																			
		59:015, Section 7(1)				Startup and Shutdown	Follow manufacturer's procedures																																																			
		Exempt from 40 CFR 63 Subpart JJJJJJ	N/A	N/A			Meet definition of gas-fired boiler in 40 CFR 63.11237																																																			
		Permit condition	VOC	Part of site-wide limit under Section D			Formulas in Section D																																																			

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
05 (105) 06 (106)	Boiler 1 Boiler 2		52:020, Section 10	Fuel Usage of Propane and Natural Gas	Monitor the type and amount of fuel combusted (in Mgal for propane and in MMscf for natural gas) on a monthly basis

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
05 (105) 06 (106)	Boiler 1 Boiler 2		52:020, Section 10 and 40 CFR 60.48c(g)	Fuel Usage of Propane and Natural Gas	Keep records of the type and amount of fuel combusted (in Mgal for propane and in MMscf for natural gas) on a monthly basis
				Startup and Shutdown	Keep records of manufacturer's procedures

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
05 (105) 06 (106)	Boiler 1 Boiler 2	PM Opacity SO ₂	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
05 (105) 06 (106)	Boiler 1 Boiler 2	PM Opacity SO2	N/A	N/A	N/A

DEP7007B**Manufacturing or Processing
Operations**Section B.1: Process InformationSection B.2: Materials and Fuel Information~~Section B.3: Notes, Comments, and Explanations~~**Additional Documentation**Complete DEP7007AI, DEP7007N,
DEP7007V, and DEP7007GG.Attach a flow diagramAttach SDS**Source Name:**U.S. Smokeless Tobacco Company - Eagle One Facility**KY EIS (AFS) #:**21-**Permit #:**V-20-002**Agency Interest (AI) ID:**121768**Date:**May 2026**Section B.1: Process Information**

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process <u>Continuous</u> or <u>Batch</u> ?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
12 (112)	Pesticide Fogging	Pesticide Foggers in 3 processing buildings	12	Pesticide Fogging	N/A	N/A	2015	Batch	7.5 gal/hr of pesticide, 8 hrs/day, 1 day/wk, 24 wk/yr in each of 3 buildings (576 hr/yr maximum total operating time and 4,320 gal/yr maximum total pesticide use)	

Section B.2: Materials and Fuel Information															
<i>*Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.</i>															
Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
12 (112)	Pesticide Fogging	Pesticide (Vectrin 3%)	7.5	gal/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
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DEP7007N

Source Emissions Profile

- [__ Section N.1: Emission Summary](#)
[__ ~~Section N.2: Stack Information~~](#)
[__ Section N.3: Fugitive Information](#)
[__ Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

__ Complete DEP7007AI

Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21- [V-20-002](#)

Permit #: [121768](#)

Agency Interest (AI) ID: [May 2026](#)

Date: [May 2026](#)

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
12 (112)	Pesticide Fogging	12	Pesticide Fogging	N/A	N/A	12-AE-01	7.5	VOC	0.253	MSDS	N/A	N/A	1.90	1.90	8.31	0.55

Section N.3: Fugitive Information								
UTM Zone:								
Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)
112	Pesticide Fogging	12-F-1					75	20

Section N.4: Notes, Comments, and Explanations

EU12 is limited in the permit to 4,320 gallons per year of pesticide. This number is used to calculate the controlled potential emissions.

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities <u> </u> Section V.1: Emission and Operating Limitation(s) <u> </u> Section V.2: Monitoring Requirements <u> </u> Section V.3: Recordkeeping Requirements <u> </u> Section V.4: Reporting Requirements <u> </u> Section V.5: Testing Requirements <u> </u> Section V.6: Notes, Comments, and Explanations	Additional Documentation <u> </u> Complete DEP7007AI					
Source Name: <u>U.S. Smokeless Tobacco Company - Eagle One Facility</u> KY EIS (AFS) #: <u>21-</u> Permit #: <u>V-20-002</u> Agency Interest (AI) ID: <u>121768</u> Date: <u>May 2026</u>							
Section V.1: Emission and Operating Limitation(s)							
Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
12 (112)	Pesticide Fogging	Permit condition	VOC	N/A	N/A	576 hours/yr and 4,320 gals/yr	Monthly and 12-month rolling throughput records
		Permit condition	VOC	Part of site-wide limit under Section D			Formulas in Section D

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
12 (112)	Pesticide Fogging	VOC	Permit condition	Hours of operation and Pesticide usage	Throughput (usage) records

Section V.3: Recordkeeping Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
12 (112)	Pesticide Fogging	VOC	Permit condition	Hours of operation and Pesticide usage	Throughput (usage) records

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
12 (112)	Pesticide Fogging	VOC	Permit condition	Exceedance of Hours of operation or Pesticide usage	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
12 (112)	Pesticide Fogging	VOC	N/A	N/A	N/A

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007EE Internal Combustion Engines <u> </u> Section EE.1: General Information <u> </u> Section EE.2: Operating Information <u> </u> Section EE.3: Design Information <u> </u> Section EE.4: Fuel Information <u> </u> Section EE.5: Emission Factor Information <u> </u> Section EE.6: Notes, Comments, and Explanations	Additional Documentation <u> </u> Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG <u> </u> Attach EPA certification of the engine								
Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility KY EIS (AFS) #: 21-_____ Permit #: V-20-002 Agency Interest (AI) ID: 121768 Date: May 2026										
Section EE.1: General Information										
Emission Unit #	Emission Unit Name	Control Device ID	Stack ID	Manufacturer	Model Number	Model Year	Date of Manufacture	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Date Reconstructed/Modified	List Applicable Regulations
13 (113)	Emergency Fire Pump	N/A	13-AE-01	Clarke	JU6H-UFADR9			2015	N/A	40 CFR 60 Subpart IIII, 40 CFR 63 Subpart ZZZZ

Section EE.2: Operating Information					
Emission Unit #	Engine Purpose (Identify if Non-Emergency, Emergency, Fire/Water Pump, Black-start engine for combustion turbine, Engine Testing)	Hours Operated	Is this engine a rental? <i>(Yes/No)</i>	Rental Time Period <i>(hrs)</i>	Alternate Operating Scenarios (Describe any operating scenarios in which the engine may be used in a different configuration)
13 (113)	Emergency (Fire Pump)	500 hr/yr (maximum)	No	N/A	N/A

Section EE.3: Design Information							
Emission Unit #	Engine Type (Identify all that apply: Commercial, Institutional, Stationary, Non-Road)	Ignition Type (Identify if either Compression or Spark Ignition)	Engine Family (Identify all that apply: 2-stroke, 4-stroke, Rich Burn, Lean Burn)	Maximum Engine Power (<i>bhp</i>)	Maximum Engine Speed (<i>rpm</i>)	Total Displacement (<i>L</i>)	Number of Cylinders
13 (113)	Non-Road	Compression Ignition	4-stroke	250	1760	415	6

Section EE.4: Fuel Information									
Emission Unit #	Identify if Primary, Secondary, or Tertiary Fuel	Fuel Type (Identify if Diesel, Gasoline, Natural Gas, Liquefied Petroleum Gas (LPG), Landfill/Digester Gas, or Other)	Fuel Grade	Percent Time Used (%)	Maximum Fuel Consumption	Heat Content	Sulfur Content (%)	SCC Code	SCC Units
13 (113)	Primary	Diesel	N/A	100%	12.3 gal/hr	138,000 Btu/gal	0.0015%	20100107	Thousands of gallons

Section EE.5: Emission Factor Information

Emission factors expressed here are based on the potential to emit.

Emission Unit #	Fuel	Pollutant	Emission Factor	Emission Factor Units	Source of Emission Factor
13 (113)	Diesel	PM	2.34	lb / 1000 gal	Manufacturer estimate
		SO ₂	0.21	lb / 1000 gal	AP-42 Section 1.3
		NO _x	120.29	lb / 1000 gal	Manufacturer estimate
		CO	20.05	lb / 1000 gal	Manufacturer estimate
		VOC	3.34	lb / 1000 gal	Manufacturer estimate
		CO ₂ e	22,579	lb / 1000 gal	40 CFR 98 Subpart C

Division for Air Quality

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Source Emissions Profile

[__ Section N.1: Emission Summary](#)[__ Section N.2: Stack Information](#)~~[__ Section N.3: Fugitive Information](#)~~[__ Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

[__ Complete DEP7007AI](#)Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)Agency Interest (AI) ID: [121768](#)Date: [May 2026](#)

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
13 (113)	Emergency Fire Pump	13	Fire Pump	N/A	N/A	13-AE-01	0.0123	PM	2.69	Manufacturer estimate	N/A	N/A	0.033	0.033	0.145	0.008
								SO2	0.213	AP-42 Section 1.3	N/A	N/A	0.003	0.003	0.011	0.001
								NOx	120.54	Manufacturer estimate	N/A	N/A	1.48	1.48	6.494	0.37
								CO	20.16	Manufacturer estimate	N/A	N/A	0.25	0.25	1.086	0.06
								VOC	2.24	Manufacturer estimate	N/A	N/A	0.03	0.03	0.121	0.01
								CO2e	22,579	40 CFR 98 Subpart C	N/A	N/A	277.7	277.7	1,216.4	69.4

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (°F)	Exit Velocity (ft/sec)
13-AE-01	13 (113)	0.5	8.5				1400	961	119

Section N.4: Notes, Comments, and Explanations

EU13 is limited to 500 hours per year of operation to calculate the controlled potential emissions.

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities ☐ Section V.1: Emission and Operating Limitation(s) ☐ Section V.2: Monitoring Requireme ☐ Section V.3: Recordkeeping Requir ☐ Section V.4: Reporting Requiremen ☐ Section V.5: Testing Requirements ☐ Section V.6: Notes, Comments, and Explanations	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: center; padding: 5px;">Additional Documentation</th> </tr> <tr> <td style="padding: 10px;"> ☐ Complete DEP7007AI </td> </tr> </table>	Additional Documentation	☐ Complete DEP7007AI			
Additional Documentation							
☐ Complete DEP7007AI							
Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility KY EIS (AFS) 21- _____ Permit #: V-20-002 Agency Interest (AI) ID: 121768 Date: May 2026							
Section V.1: Emission and Operating Limitation(s)							
Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
13 (113)	Emergency Fire Pump	40 CFR 60.4205(c) 40 CFR 60.4205(c) 40 CFR 60.4207(b)	NOx + HC PM SO2	4.0 g/kW-hr 0.20 g/kW-hr 15 ppm fuel S	N/A	N/A	Manufacturers certificate Fuel certificates
		40 CFR 63.6590(c)	N/A	N/A	N/A	Meet the 40 CFR 63 Subpart ZZZZ requirements by meeting the applicable requirements of 40 CFR 60 Subpart IIII.	Because the engine meets the criteria in 63.6590(c)(1), no further requirements in 40 CFR 63 Subpart ZZZZ are applicable.
		40 CFR 60.4211(a)	N/A	N/A	N/A	Operate and maintain engine according to manufacturer specifications	Maintenance records
		40 CFR 60.4211(f)	N/A	N/A	N/A	100 hours/CY for maintenance and readiness testing. 50 hrs/CY non-emergency use	Non-resettable hour meter, records of operating hours and reason for operation

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
13 (113)	Emergency Fire Pump	NOx + HC PM	40 CFR 60.4211(c)	N/A	Purchase a certified engine and install and configure engine in accordance with manufacturer's emission-related specifications.
		SO2	Permit Condition	N/A	Maintain fuel supplier certifications indicating sulfur content of purchased fuel.
		N/A	40 CFR 60.4211(a)	N/A	Operate and maintain engine in accordance with manufacturer's emission-related instructions and change only those emission-related settings that are permitted by the manufacturer.
		N/A	40 CFR 60.4214(b)	Operating hours	Maintain records of engine operating hours and reason for operation.

Section V.3: Recordkeeping Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
13 (113)	Emergency Fire Pump	NOx + HC PM	40 CFR 60.4211(c)	Emission certificate	Emission certificate from engine manufacturer
		SO2	Permit Condition	Diesel sulfur content	Diesel certificates from fuel supplier showing sulfur content
		N/A	40 CFR 60.4211(a)	Engine maintenance	Engine maintenance records
		N/A	40 CFR 60.4214(b)	Operating hours	Records of operating hours and reason for operation

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
13 (113)	Emergency Fire Pump	NOx + HC PM	N/A	N/A	N/A
		SO2	N/A	N/A	N/A
		N/A	N/A	N/A	N/A
		N/A	Permit condition	Operating hour exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
13 (113)	Emergency Fire Pump	NOx + HC PM SO2	N/A	N/A	N/A
13 (113)	Emergency Fire Pump	N/A	N/A	N/A	N/A
13 (113)	Emergency Fire Pump	N/A	N/A	N/A	N/A

DEP7007EE**Internal Combustion Engines**

- ☐ Section EE.1: General Information
☐ Section EE.2: Operating Information
☐ Section EE.3: Design Information
☐ Section EE.4: Fuel Information
☐ Section EE.5: Emission Factor Information
☒ ~~Section EE.6: Notes, Comments, and Explanations~~

Additional Documentation

- ☐ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG
☐ Attach EPA certification of the engine

Division for Air Quality

300 Sower Boulevard
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Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: May 2026

Section EE.1: General Information

Emission Unit #	Emission Unit Name	Control Device ID	Stack ID	Manufacturer	Model Number	Model Year	Date of Manufacture	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Date Reconstructed/Modified	List Applicable Regulations
16 (116)	25 kWe emergency generator	N/A	16-AE-01	TBD	TBD	TBD	TBD	2027	N/A	40 CFR 60 Subpart JJJJ, 40 CFR 63 Subpart ZZZZ

Section EE.2: Operating Information					
Emission Unit #	Engine Purpose (Identify if Non-Emergency, Emergency, Fire/Water Pump, Black-start engine for combustion turbine, Engine Testing)	Hours Operated	Is this engine a rental? (Yes/No)	Rental Time Period (hrs)	Alternate Operating Scenarios (Describe any operating scenarios in which the engine may be used in a different configuration)
16 (116)	25 kWe emergency generator	500 hr/yr (maximum)	No	N/A	N/A

Section EE.3: Design Information							
Emission Unit #	Engine Type (Identify all that apply: Commercial, Institutional, Stationary, Non-Road)	Ignition Type (Identify if either Compression or Spark Ignition)	Engine Family (Identify all that apply: 2-stroke, 4-stroke, Rich Burn, Lean Burn)	Maximum Engine Power (<i>bhp</i>)	Maximum Engine Speed (<i>rpm</i>)	Total Displacement (<i>L</i>)	Number of Cylinders
16 (116)	25 kWe emergency generator	Spark Ignition	4-stroke	60 (estimated)	TBD	TBD	TBD

Section EE.4: Fuel Information									
Emission Unit #	Identify if Primary, Secondary, or Tertiary Fuel	Fuel Type (Identify if Diesel, Gasoline, Natural Gas, Liquefied Petroleum Gas (LPG), Landfill/Digester Gas, or Other)	Fuel Grade	Percent Time Used (%)	Maximum Fuel Consumption	Heat Content	Sulfur Content (%)	SCC Code	SCC Units
16 (116)	Primary	Natural Gas	N/A	100%	377 ft ³ /hr (estimated)	1,000 Btu/ft ³	negligible	10300603	hours

Section EE.5: Emission Factor Information

Emission factors expressed here are based on the potential to emit.

Emission Unit #	Fuel	Pollutant	Emission Factor	Emission Factor Units	Source of Emission Factor
16 (116)	Natural Gas	PM	0.0073	lb/hr (estimated)	Estimate
		SO ₂	0.00022	lb/hr (estimated)	Estimate
		NO _x	0.49	lb/hr (estimated)	Manufacturer
		CO	4.50	lb/hr (estimated)	Manufacturer
		VOC	0.004	lb/hr (estimated)	Estimate
		CO ₂ e	51.47	lb/hr (estimated)	40 CFR 98 Subpart C

Division for Air Quality

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DEP7007N

Source Emissions Profile

- [__ Section N.1: Emission Summary](#)
[__ Section N.2: Stack Information](#)
[__ ~~Section N.3: Fugitive Information~~](#)
[__ Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

[__ Complete DEP7007AI](#)

Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)

Agency Interest (AI) ID: [121768](#)

Date: [May 2026](#)

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
16 (116)	Emergency Generator	16	Emergency Generator	N/A	N/A	16-AE-01	1.0 (hours)	PM	0.0073	Estimate	N/A	N/A	0.007	0.007	0.032	0.0018
								SO2	0.00022	Estimate	N/A	N/A	0.000	0.000	0.001	0.000055
								NOx	0.49	Manufacturer	N/A	N/A	0.49	0.49	2.16	0.12
								CO	4.50	Manufacturer	N/A	N/A	4.50	4.50	19.69	1.12
								VOC	0.004	Estimate	N/A	N/A	0.00	0.00	0.018	0.0010
								CO2e	51.47	40 CFR 98 Subpart C	N/A	N/A	51.5	51.5	225.4	12.9

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (°F)	Exit Velocity (ft/sec)
16-AE-01	16 (116)	TBD	TBD				TBD	TBD	TBD

Section N.4: Notes, Comments, and Explanations

EU16 to be limited to 500 hours per year of operation to calculate the controlled potential emissions.

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities ☐ Section V.1: Emission and Operating Limitation(s) ☐ Section V.2: Monitoring Requireme ☐ Section V.3: Recordkeeping Requir ☐ Section V.4: Reporting Requiremen ☐ Section V.5: Testing Requirements ☒ Section V.6: Notes, Comments, and Explanations	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: center; padding: 5px;">Additional Documentation</th> </tr> <tr> <td style="padding: 10px;"> ___ Complete DEP7007AI </td> </tr> </table>	Additional Documentation	___ Complete DEP7007AI																														
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Source Name: <u>U.S. Smokeless Tobacco Company - Eagle One Facility</u> KY EIS (AFS) 21- _____ Permit #: <u>V-20-002</u> Agency Interest (AI) ID: <u>121768</u> Date: <u>May 2026</u>																																		
Section V.1: Emission and Operating Limitation(s) <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 10%;">Emission Unit #</th> <th style="width: 15%;">Emission Unit Description</th> <th style="width: 15%;">Applicable Regulation or Requirement</th> <th style="width: 10%;">Pollutant</th> <th style="width: 10%;">Emission Limit (if applicable)</th> <th style="width: 10%;">Voluntary Emission Limit or Exemption (if applicable)</th> <th style="width: 15%;">Operating Requirement or Limitation (if applicable)</th> <th style="width: 25%;">Method of Determining Compliance with the Emission and Operating Requirement(s)</th> </tr> </thead> <tbody> <tr> <td>16 (116)</td> <td>Emergency Generator</td> <td>Table 1 to 40 CFR 60 Subpart JJJJ</td> <td>NOx CO</td> <td>10 g/kW-hr 387 g/kW-hr</td> <td>N/A</td> <td>N/A</td> <td>Manufacturers certificate Fuel certificates</td> </tr> <tr> <td></td> <td></td> <td>40 CFR 60.4243(d)</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td>100 hours/CY for maintenance and readiness testing. 50 hrs/CY non-emergency use</td> <td>Non-resettable hour meter, records of operating hours and reason for operation</td> </tr> <tr> <td></td> <td></td> <td>40 CFR 63 Subpart ZZZZ</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td>Meet the 40 CFR 63 Subpart ZZZZ requirements by meeting the applicable requirements of 40 CFR 60 Subpart JJJJ.</td> <td>None</td> </tr> </tbody> </table>			Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)	16 (116)	Emergency Generator	Table 1 to 40 CFR 60 Subpart JJJJ	NOx CO	10 g/kW-hr 387 g/kW-hr	N/A	N/A	Manufacturers certificate Fuel certificates			40 CFR 60.4243(d)	N/A	N/A	N/A	100 hours/CY for maintenance and readiness testing. 50 hrs/CY non-emergency use	Non-resettable hour meter, records of operating hours and reason for operation			40 CFR 63 Subpart ZZZZ	N/A	N/A	N/A	Meet the 40 CFR 63 Subpart ZZZZ requirements by meeting the applicable requirements of 40 CFR 60 Subpart JJJJ.	None
Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)																											
16 (116)	Emergency Generator	Table 1 to 40 CFR 60 Subpart JJJJ	NOx CO	10 g/kW-hr 387 g/kW-hr	N/A	N/A	Manufacturers certificate Fuel certificates																											
		40 CFR 60.4243(d)	N/A	N/A	N/A	100 hours/CY for maintenance and readiness testing. 50 hrs/CY non-emergency use	Non-resettable hour meter, records of operating hours and reason for operation																											
		40 CFR 63 Subpart ZZZZ	N/A	N/A	N/A	Meet the 40 CFR 63 Subpart ZZZZ requirements by meeting the applicable requirements of 40 CFR 60 Subpart JJJJ.	None																											

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
16 (116)	Emergency Generator	NOx CO	40 CFR 60 Subpart JJJJ	N/A	Purchase a certified engine.
		N/A	40 CFR 60 Subpart JJJJ	Operating hours	Maintain records of engine operating hours and reason for operation.

Section V.3: Recordkeeping Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
16 (116)	Emergency Generator	NOx CO	40 CFR 60 Subpart JJJJ	Emission certificate	Emission certificate from engine manufacturer
		N/A	40 CFR 60 Subpart JJJJ	Operating hours	Records of operating hours and reason for operation

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
16 (116)	Emergency Generator	NOx CO	N/A	N/A	N/A
		N/A	Permit condition	Operating hour exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
16 (116)	Emergency Generator	NOx CO	N/A	N/A	N/A

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007EE Internal Combustion Engines <u> </u> Section EE.1: General Information <u> </u> Section EE.2: Operating Information <u> </u> Section EE.3: Design Information <u> </u> Section EE.4: Fuel Information <u> </u> Section EE.5: Emission Factor Information <u> </u> Section EE.6: Notes, Comments, and Explanations	Additional Documentation <u> </u> Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG <u> </u> Attach EPA certification of the engine								
Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility KY EIS (AFS) #: 21-_____ Permit #: V-20-002 Agency Interest (AI) ID: 121768 Date: May 2026										
Section EE.1: General Information										
Emission Unit #	Emission Unit Name	Control Device ID	Stack ID	Manufacturer	Model Number	Model Year	Date of Manufacture	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Date Reconstructed/Modified	List Applicable Regulations
17 (117)	100 kWe emergency generator	N/A	17-AE-01	Kohler	KG100R	2027	2027	2027	N/A	40 CFR 60 Subpart JJJJ, 40 CFR 63 Subpart ZZZZ

Section EE.2: Operating Information					
Emission Unit #	Engine Purpose (Identify if Non-Emergency, Emergency, Fire/Water Pump, Black-start engine for combustion turbine, Engine Testing)	Hours Operated	Is this engine a rental? (Yes/No)	Rental Time Period (hrs)	Alternate Operating Scenarios (Describe any operating scenarios in which the engine may be used in a different configuration)
17 (117)	100 kWe emergency generator	500 hr/yr (maximum)	No	N/A	N/A

Section EE.3: Design Information							
Emission Unit #	Engine Type (Identify all that apply: Commercial, Institutional, Stationary, Non-Road)	Ignition Type (Identify if either Compression or Spark Ignition)	Engine Family (Identify all that apply: 2-stroke, 4-stroke, Rich Burn, Lean Burn)	Maximum Engine Power (<i>bhp</i>)	Maximum Engine Speed (<i>rpm</i>)	Total Displacement (<i>L</i>)	Number of Cylinders
17 (117)	Non-Road	Spark Ignition	4-stroke	204	1800	6.2	8

Section EE.4: Fuel Information									
Emission Unit #	Identify if Primary, Secondary, or Tertiary Fuel	Fuel Type (Identify if Diesel, Gasoline, Natural Gas, Liquefied Petroleum Gas (LPG), Landfill/Digester Gas, or Other)	Fuel Grade	Percent Time Used (%)	Maximum Fuel Consumption	Heat Content	Sulfur Content (%)	SCC Code	SCC Units
17 (117)	Primary	Natural Gas	N/A	100%	1,473 ft3/hr (estimated)	1,000 Btu/ft3	negligible	10300603	hours

Section EE.5: Emission Factor Information

Emission factors expressed here are based on the potential to emit.

Emission Unit #	Fuel	Pollutant	Emission Factor	Emission Factor Units	Source of Emission Factor
17 (117)	Natural Gas	PM	0.023	lb/hr (estimated)	Estimate
		SO ₂	0.00071	lb/hr (estimated)	Estimate
		NO _x	0.90	lb/hr (estimated)	Manufacturer
		CO	1.80	lb/hr (estimated)	Manufacturer
		VOC	0.013	lb/hr (estimated)	Estimate
		CO ₂ e	201.18	lb/hr (estimated)	40 CFR 98 Subpart C

Division for Air Quality

300 Sower Boulevard
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DEP7007N

Source Emissions Profile

[__ Section N.1: Emission Summary](#)[__ Section N.2: Stack Information](#)[__ ~~Section N.3: Fugitive Information~~](#)[__ Section N.4: Notes, Comments, and Explanations](#)

Additional Documentation

[__ Complete DEP7007AI](#)Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)Agency Interest (AI) ID: [121768](#)Date: [May 2026](#)**N.1: Emission Summary**

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
17 (117)	Emergency Generator	17	Emergency Generator	N/A	N/A	17-AE-01	1.0 (hours)	PM	0.023	Estimate	N/A	N/A	0.023	0.023	0.102	0.0058
								SO2	0.00071	Estimate	N/A	N/A	0.001	0.001	0.003	0.000177
								NOx	0.90	Manufacturer	N/A	N/A	0.90	0.90	3.94	0.22
								CO	1.80	Manufacturer	N/A	N/A	1.80	1.80	7.88	0.45
								VOC	0.013	Estimate	N/A	N/A	0.01	0.01	0.058	0.0033
								CO2e	201.18	40 CFR 98 Subpart C	N/A	N/A	201.2	201.2	881.2	50.3

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter (ft)	Height (ft)	Base Elevation (ft)	Northing (m)	Easting (m)	Flowrate (acfm)	Temperature (°F)	Exit Velocity (ft/sec)
17-AE-01	17 (117)	TBD	TBD				TBD	TBD	TBD

Section N.4: Notes, Comments, and Explanations

EU17 is limited to 500 hours per year of operation to calculate the controlled potential emissions.

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities ☐ Section V.1: Emission and Operating Limitation(s) ☐ Section V.2: Monitoring Requirements ☐ Section V.3: Recordkeeping Requirements ☐ Section V.4: Reporting Requirements ☐ Section V.5: Testing Requirements ☒ Section V.6: Notes, Comments, and Explanations	Additional Documentation ___ Complete DEP7007AI
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Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) 21- _____

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: May 2026

Section V.1: Emission and Operating Limitation(s)							
Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
17 (117)	Emergency Generator	Table 1 to 40 CFR 60 Subpart JJJJ	NOx CO	2.0 g/kW-hr 4.0 g/kW-hr	N/A	N/A	Manufacturers certificate Fuel certificates
		40 CFR 60.4243(d)	N/A	N/A	N/A	100 hours/CY for maintenance and readiness testing. 50 hrs/CY non-emergency use	Non-resettable hour meter, records of operating hours and reason for operation
		40 CFR 63 Subpart ZZZZ	N/A	N/A	N/A	Meet the 40 CFR 63 Subpart ZZZZ requirements by meeting the applicable requirements of 40 CFR 60 Subpart JJJJ.	None

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
17 (117)	Emergency Generator	NOx CO	40 CFR 60 Subpart JJJJ	N/A	Purchase a certified engine.
		N/A	40 CFR 60 Subpart JJJJ	Operating hours	Maintain records of engine operating hours and reason for operation.

Section V.3: Recordkeeping Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
17 (117)	Emergency Generator	NOx CO	40 CFR 60 Subpart JJJJ	Emission certificate	Emission certificate from engine manufacturer
		N/A	40 CFR 60 Subpart JJJJ	Operating hours	Records of operating hours and reason for operation

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
17 (117)	Emergency Generator	NOx CO	N/A	N/A	N/A
		N/A	Permit condition	Operating hour exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
17 (117)	Emergency Generator	NOx CO	N/A	N/A	N/A

Tobacco Finishing

Eagle One Facility
U.S. Smokeless Tobacco Company
Hopkinsville, KY

This Unit includes the installation of new equipment

- ♦ Emission Unit 14 (114): Tobacco Finishing Process – Process Description, Process Flow Diagram, and Forms DEP7007B, DEP7007N, and DEP7007V

Tobacco Finishing Process Description

Tobacco Finishing consists of Emission Unit 14 (114) Tobacco Finishing Process, described below.

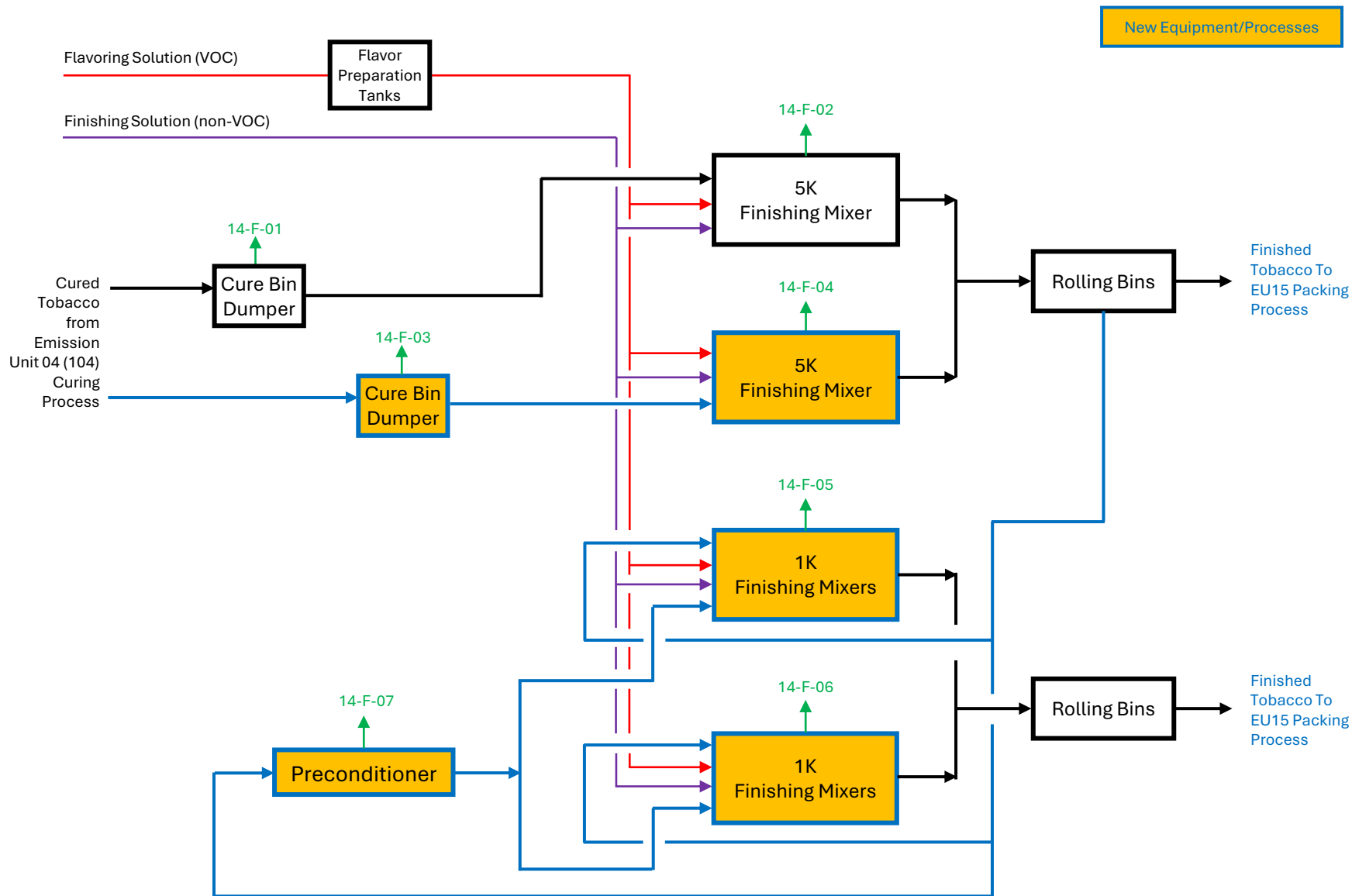
EMISSION UNIT 14 (114) TOBACCO FINISHING PROCESS

The Tobacco Finishing Process involves mixing cured tobacco with a finishing solution and a flavor solution in a finishing mixer. Cured tobacco enters this process from Emission Unit 04 (104) Curing Process.

The Tobacco Finishing Process consists of an existing cure bin dumper and an existing finishing mixer. An additional cure bin dumper and finishing mixer were requested with the May 2025 renewal application. In addition, for this application, two smaller finishing mixers and a pre-conditioner are also requested to be added to the list of finishing process equipment. The finishing process involves applying finishing solution and flavor solution that typically includes VOC-based flavor (ethanol VOC) to the cured tobacco to produce a final moist snuff product. VOC emissions from the finishing operation are comprised of a portion of the ethanol applied and a small amount of non-ethanol VOC. No additional throughput is requested, and emissions from finishing will not increase from the current permit. The pre-conditioner has trivial new emissions. The additional finishing mixers allow for better product integrity.

Finished tobacco is transferred in rolling bins to new emission unit EU15 (115) Packing Process for packaging into cans and pouches. Previously, the finished tobacco was transferred off-site to another UST facility for packing.

A process flow diagram for Emission Unit 14 (114) Tobacco Finishing Process is provided as **Figure 7**.



Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007B Manufacturing or Processing Operations <u>Section B.1: Process Information</u> <u>Section B.2: Materials and Fuel Information</u> <u>Section B.3: Notes, Comments, and Explanations</u>	Additional Documentation ___ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG. ___ Attach a flow diagram ___ Attach SDS
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Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: April 2025

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process <u>Continuous</u> or <u>Batch</u> ?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
14 (114)	Tobacco Finishing Process	see process description	14-AE-01 14-AE-03	Cure Bin Dumpers			August 2017	Batch		
			14-F-02 14-F-04	5K Finishing Mixers - Custom Designed and Built			Mixer 1 - August 2017 Mixer 2 - TBD	Batch		
			14-F-05 14-F-06	1K Finishing Mixers - Custom Designed and Built			Upon permit issuance	Batch		
			included above	One or more blending/storage tanks for finishing flavor solution			August 2017	Batch		
			14-F-07	Pre-conditioner			Upon permit issuance	Batch		

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
14 (114)	Tobacco Finishing Process	Cured Tobacco	9.16	tons/hr	12	Finished Tobacco	12	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A
		VOC Finishing Solution (ethanol)	55.92	lbs/hr	included above	included above	included above	included above							
		Dry Flour Tobacco	0.25	tons/hr	0.25	Finished Tobacco	0.25	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007N

Source Emissions Profile

[_ Section N.1: Emission Summary](#)~~[_ Section N.2: Stack Information](#)~~[_ Section N.3: Fugitive Informatio](#)[_ Section N.4: Notes, Comments, and Explanations](#)**Additional Documentation**[_ Complete DEP7007AI](#)Source Name: [U.S. Smokeless Tobacco Company - Eagle One Facility](#)

KY EIS (AFS) #: 21-

Permit #: [V-20-002](#)Agency Interest (AI) ID: [121768](#)Date: [May 2026](#)**N.1: Emission Summary**

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
14 (114)	Tobacco Finishing Process	14-AE-01 14-AE-03	Cure Bin Dumpers			14-AE-01 14-AE-03	12.00	VOC	3.235	Engr. Est.			38.82	38.82	170.0	63.24
		14-F-02 14-F-04	5K Finishing Mixers			14-F-02 14-F-04	included above	included above	included above	included above			included above	included above	included above	included above
		14-F-05 14-F-06	1K Finishing Mixers			14-F-05 14-F-06	included above	included above	included above	included above			included above	included above	included above	included above
		included above	One or more blending/storage tanks for finishing flavor solution			included above	included above	included above	included above	included above			included above	included above	included above	included above
		included above	Rolling Bins			included above	included above	included above	included above	included above			included above	included above	included above	included above
		14-F-07	Pre-conditioner			14-F-07	0.25	VOC	0.0246	Engr. Est.			0.006	0.006	0.03	0.006

Section N.3: Fugitive Information								
UTM Zone:								
Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)
14 (114)	Tobacco Finishing Process	14-F-01						
		14-F-03						
		14-F-02						
		14-F-04						
		14-F-05						
		14-F-06						
		14-F-07						

Section N.4: Notes, Comments, and Explanations

EU014 is limited in the permit to 39,100 tons per year of total finished tobacco.

The tobacco pre-conditioner throughput will not exceed 500 tons/yr.

These numbers are used to calculate the controlled potential emissions.

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities Additional Documentation	Complete DEP7007AI					
Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility KY EIS (AFS) #: 21- V-20-002 Permit #: 121768 Agency Interest (AI) ID: April 2025 Date:							
Section V.1: Emission and Operating Limitation(s)							
Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
114	Finishing Process	Permit condition	Throughput			39,100 tons total tobacco/year	Monthly and 12-Month Rolling Throughput records
		Permit condition	VOC	Part of site-wide limit under Section D			Formulas in Section D

Section V.2: Monitoring Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
114	Finishing Process	Throughput	Permit Condition	Operation	Production Records

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
114	Finishing Process	Throughput	Permit Condition	Production	Production throughputs are totaled each month

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
114	Finishing Process	Throughput	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
114	Finishing Process	Throughput	None	None	None

Tobacco Packing

Eagle One Facility
U.S. Smokeless Tobacco Company
Hopkinsville, KY

This Unit represents new equipment

- ♦ Emission Unit 15 (115): Tobacco Packing Process – Process Description, Process Flow Diagram, and Forms DEP7007B, DEP7007N, and DEP7007V

Tobacco Packing Process Description

Tobacco Finishing will consist of Emission Unit 14 (114) Tobacco Finishing Process, described below.

EMISSION UNIT 15 (115) TOBACCO PACKING PROCESS

The Tobacco Packing Process involves packing finished tobacco into final products for sale. Finished tobacco enters this process from Emission Unit 14 (114) Finishing process.

The Tobacco Packing Process consists of seven packing lines (4 loose, 2 pouch, and 1 mesh pack). VOC emissions from the packing operation are comprised of a portion of the ethanol applied in finishing. The packing equipment needs to be cleaned occasionally, and this is done using mineral spirits and ethanol-based alcohol. Emissions from cleaning are assumed to be 100% of the mineral spirits and ethanol-based alcohol used.

A process flow diagram for Emission Unit 14 (114) Tobacco Finishing Process is provided as **Figure 7**.

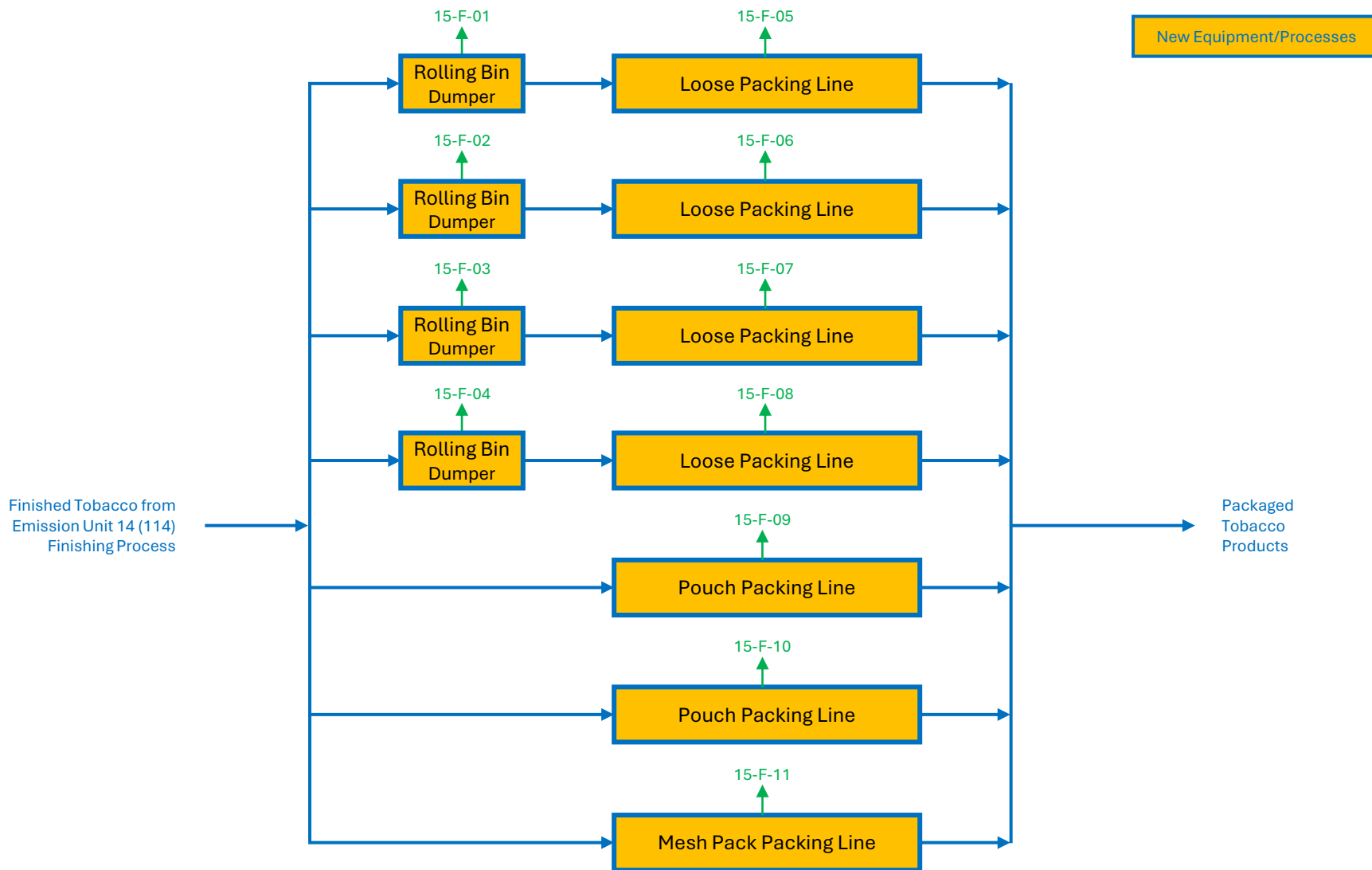


Figure 8
Emission Unit 15 (115) Tobacco Packing Process

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007B

Manufacturing or Processing Operations

- Section B.1: Process Information
 Section B.2: Materials and Fuel Information
 ~~Section B.3: Notes, Comments, and Explanations~~

Additional Documentation

- Complete DEP7007AI,
DEP7007N, DEP7007V, and
DEP7007GG.
 Attach a flow diagram
 Attach SDS

Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility

KY EIS (AFS) #: 21-

Permit #: V-20-002

Agency Interest (AI) ID: 121768

Date: May 2026

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement (MM/YYYY)	Is the Process <u>Continuous</u> or <u>Batch</u> ?	Number of Batches per 24 Hours (if applicable)	Hours per Batch (if applicable)
15 (115)	Tobacco Packing Process	see process description	14-F-01 14-F-03 14-F-05 14-F-07	Rolling Bin Dumpers			Upon permit issuance	Continuous		
			14-F-02 14-F-04 14-F-06 14-F-08	Four Loose Packing Lines			Upon permit issuance	Continuous		
			14-F-09 14-F-10	Two Pouch Packing Lines			Upon permit issuance	Continuous		
			14-F-11	Mesh Pack Packing Line			Upon permit issuance	Continuous		
			14-F-12	Equipment Cleaning			Upon permit issuance	Batch		

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input		Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output		Fuel Type	Maximum Hourly Fuel Usage Rate		Maximum Yearly Fuel Usage Rate		Sulfur Content (%)	Ash Content (%)
				(Specify Units/hr)				(Specify Units/hr)			(Specify Units)		(Specify Units)		
15 (115)	Tobacco Packing Process	Finished Tobacco	15.4	tons/hr	15.4	Finished Tobacco	15.4	tons/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Equipment Cleaning	Mineral Spirits and Ethanol	70.73	lbs/hr	0.03537	cleaned equipment	70.73	lbs/hr	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007N Source Emissions Profile _ Section N.1: Emission Summary _ Section N.2: Stack Information _ Section N.3: Fugitive Informatio _ Section N.4: Notes, Comments, and Explanations	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: center;">Additional Documentation</th> </tr> <tr> <td style="padding: 5px;"> _ Complete DEP7007AI </td> </tr> </table>	Additional Documentation	_ Complete DEP7007AI												
Additional Documentation																
_ Complete DEP7007AI																
Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility																
KY EIS (AFS) #: 21-																
Permit #: V-20-002																
Agency Interest (AI) ID: 121768																
Date: May 2026																
N.1: Emission Summary																
Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
15 (115)	Tobacco Packing Process	14-F-01 14-F-03 14-F-05 14-F-07	Rolling Bin Dumpers			14-F-01 14-F-03 14-F-05 14-F-07	15.4	VOC	0.803	Engr. Est.			12.36	12.36	54.15	15.69
		14-F-02 14-F-04 14-F-06 14-F-08	Four Loose Packing Lines			14-F-02 14-F-04 14-F-06 14-F-08	included above	included above	included above	included above			included above	included above	included above	included above
		14-F-09 14-F-10	Two Pouch Packing Lines			14-F-09 14-F-10	included above	included above	included above	included above			included above	included above	included above	included above
		14-F-11	Mesh Pack Packing Line			14-F-11	included above	included above	included above	included above			included above	included above	included above	included above
		14-F-12	Equipment Cleaning			14-F-12	0.0354	VOC	2000	Mass Balance			70.73	70.73	15.49	4.73

Section N.3: Fugitive Information								
UTM Zone:								
Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side (ft)	Length of the Y Side (ft)	Northing (m)	Easting (m)	Release Temperature (°F)	Release Height (ft)
15 (115)	Tobacco Packing Process	14-F-01 14-F-03 14-F-05 14-F-07						
		14-F-02 14-F-04 14-F-06 14-F-08						
		14-F-09 14-F-10						
		14-F-11						
		14-F-12						

Section N.4: Notes, Comments, and Explanations

EU15 will be limited in the permit to 39,100 tons per year of total tobacco. EU15 will be limited to 4.7 tons/yr of mineral spirits and ethanol (combined). These numbers are used to calculate the controlled potential emissions.

Division for Air Quality 300 Sower Boulevard Frankfort, KY 40601 (502) 564-3999	DEP7007V Applicable Requirements and Compliance Activities ___ Section V.1: Emission and Operating Limitation(s) ___ Section V.2: Monitoring Requirements ___ Section V.3: Recordkeeping Requirements ___ Section V.4: Reporting Requirements ___ Section V.5: Testing Requirements ___ Section V.6: Notes, Comments, and Explanations	Additional Documentation ___ Complete DEP7007AI																																
Source Name: U.S. Smokeless Tobacco Company - Eagle One Facility KY EIS (AFS) #: 21- Permit #: V-20-002 Agency Interest (AI) ID: 121768 Date: May 2026																																		
Section V.1: Emission and Operating Limitation(s) <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 10%;">Emission Unit #</th> <th style="width: 15%;">Emission Unit Description</th> <th style="width: 15%;">Applicable Regulation or Requirement</th> <th style="width: 10%;">Pollutant</th> <th style="width: 15%;">Emission Limit (if applicable)</th> <th style="width: 10%;">Voluntary Emission Limit or Exemption (if applicable)</th> <th style="width: 10%;">Operating Requirement or Limitation (if applicable)</th> <th style="width: 25%;">Method of Determining Compliance with the Emission and Operating Requirement(s)</th> </tr> </thead> <tbody> <tr> <td style="color: blue;">115</td> <td style="color: blue;">Packing Process</td> <td style="color: blue;">Permit condition</td> <td style="color: blue;">Throughput</td> <td></td> <td></td> <td style="color: blue;">39,100 tons total tobacco/year</td> <td style="color: blue;">Monthly and 12-Month Rolling Throughput records</td> </tr> <tr> <td></td> <td></td> <td></td> <td style="color: blue;">Throughput</td> <td></td> <td></td> <td style="color: blue;">4.7 tons total mineral spirits and ethanol used for equipment cleaning</td> <td style="color: blue;">Monthly and 12-Month Rolling Throughput records</td> </tr> <tr> <td></td> <td></td> <td style="color: blue;">Permit condition</td> <td style="color: blue;">VOC</td> <td style="color: blue;">Part of site-wide limit under Section D</td> <td></td> <td></td> <td style="color: blue;">Formulas (to be added) in Section D</td> </tr> </tbody> </table>			Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)	115	Packing Process	Permit condition	Throughput			39,100 tons total tobacco/year	Monthly and 12-Month Rolling Throughput records				Throughput			4.7 tons total mineral spirits and ethanol used for equipment cleaning	Monthly and 12-Month Rolling Throughput records			Permit condition	VOC	Part of site-wide limit under Section D			Formulas (to be added) in Section D
Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)																											
115	Packing Process	Permit condition	Throughput			39,100 tons total tobacco/year	Monthly and 12-Month Rolling Throughput records																											
			Throughput			4.7 tons total mineral spirits and ethanol used for equipment cleaning	Monthly and 12-Month Rolling Throughput records																											
		Permit condition	VOC	Part of site-wide limit under Section D			Formulas (to be added) in Section D																											

Section V.2: Monitoring Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
115	Packing Process	Throughput	Permit Condition	Operation	Production Records

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
115	Packing Process	Throughput	Permit Condition	Operation	Production throughputs are totaled each month

Section V.4: Reporting Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
115	Packing Process	Throughput	Permit Condition	Exceedance	Promptly upon discovery and summary report at 6-month intervals

Section V.5: Testing Requirements					
Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
115	Packing Process	Throughput	None	None	None

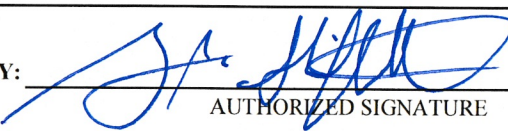
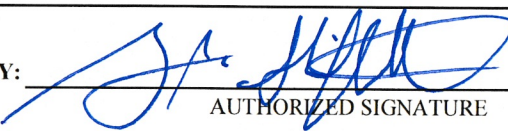
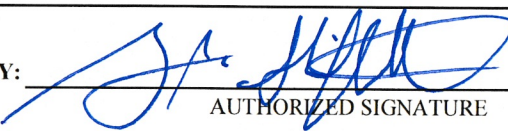
CAM Applicability

The compliance assurance monitoring (CAM) rule, 40 CFR Part 64, applies on a pollutant-specific basis to emission units that rely on air pollution control equipment to achieve compliance with applicable standards. A CAM applicability assessment has been completed for the Eagle One Facility to identify if any emission units are subject to these provisions. In accordance with §64.2(a) of the rule, CAM requirements apply if:

- The unit is subject to an emission limitation or standard for a regulated air pollutant (or surrogate of the regulated pollutant).
- A control device is used by the emission unit to achieve compliance with the emission limitation or standard.
- Pre-control device potential emissions of the regulated air pollutant are equal to or greater than 100 percent of the major source threshold (in tons per year).
- The unit is not otherwise exempt in accordance with §64.2(b) of the CAM rule.

As shown in the table below, no emission units at the Eagle One Facility are subject to CAM requirements based on pre-control device (uncontrolled) potential emissions being below major source threshold levels.

Emission Unit Ref. No.	Equipment Ref. No.	Equipment	Control Device Ref. No.	PM/PM10 Emission Estimates			CAM Applicable?
				Throughput (tons/yr)	Pre-control Emission Factor (lbs/ton)	Pre-control Emissions (tons/yr)	
Emission Unit 01 (101) Dry Flour Casing and Cutting Process	BH0101	Global Dust Collector (Stem Dumper and Shaker)	BH0101	21,900	1.714	18.8	No
	BH0102	Global Dust Collector (Lamina Feeder, EU03 Tote Dumper and Use Hoppers)	BH0102	22,482	1.286	14.5	No
	BH0103	Global Dust Collector (Hogshead Picker, Sorters and Conveyors)	BH0103	22,482	2.143	24.1	No
	CF0101 - CF0105	Cutters	BH0104 - BH0107	22,482	0.131	1.5	No
Emission Unit 02 (102A) Dry Flour Drying Process A	DF0201	Fluidized Bed Dryer	CY0201	11,241	4	22.5	No
	BH0201	Fluidize Bed Dryer Dust Return	BH0201	11,241	0.429	2.4	No
	BH0202	Global Dust Collector (Conveyors, Sifting, Tote Filling, and Surge Silo)	BH0202	11,241	1.371	7.7	No
	TP0201	Truck Filling	BH0204	11,241	0.513	2.9	No
Emission Unit 03 (102B) Dry Flour Drying Process B	DA0201	DLL Dryer	CY0202	11,241	1	5.6	No
	BH0205	Global Dust Collector (Conveyors, Sifting, Tote Filling, and Surge Silo)	BH0205	11,241	1.371	7.7	No
	TP0202	Truck Filling	BH0207	11,241	0.513	2.9	No
Emission Unit 03 (103) Into Cure Process	BH0301	Dust Collector (Tote Dumper and Use Hoppers)	BH0301	32,850	0.229	3.8	No

Division for Air Quality Submit to the Regional Office identified in your	DEP7007CC Compliance Certification <u>Section CC.1: Source Information</u> <u>Section CC.2: Signature Block</u> <u>Section CC.3: Identification of Emission Units & Each Term or Condition of the Permit</u> <u>Section CC.4: Notes, Comments, and Explanations</u>															
Section CC.1: Source Information																
1) Source Name <u>U.S. Smokeless Tobacco Company</u>	2) Agency Interest (AI) ID <u>121768</u>															
3) Source Location Address (street, city, state, zip) <u>100 Weyman's Way, Hopkinsville, KY 42240</u>																
4) Technical Contact (name, e-mail, phone #) <u>Maurice Chemweno</u>																
5) Permit Number(s) <u>V-20-002</u>	6) County <u>Christian</u>	7) KY EIS (AFS) # <u>21-</u>														
8) Submittal Information Are you certifying any requirement(s) as "not in continuous compliance?" ☐ Yes ☒ No What is the reporting period? <table style="display: inline-table; border: none;"> <tr> <td style="text-align: center;"><u>01</u></td> <td style="text-align: center;"><u>01</u></td> <td style="text-align: center;"><u>24</u></td> <td style="text-align: center;">TO</td> <td style="text-align: center;"><u>04</u></td> <td style="text-align: center;"><u>30</u></td> <td style="text-align: center;"><u>25</u></td> </tr> <tr> <td style="text-align: center;">mm/</td> <td style="text-align: center;">dd/</td> <td style="text-align: center;">yy</td> <td></td> <td style="text-align: center;">mm/</td> <td style="text-align: center;">dd/</td> <td style="text-align: center;">yy</td> </tr> </table>			<u>01</u>	<u>01</u>	<u>24</u>	TO	<u>04</u>	<u>30</u>	<u>25</u>	mm/	dd/	yy		mm/	dd/	yy
<u>01</u>	<u>01</u>	<u>24</u>	TO	<u>04</u>	<u>30</u>	<u>25</u>										
mm/	dd/	yy		mm/	dd/	yy										
Section CC.2: Signature Block																
9) CERTIFICATION SIGNATURE <i>I, THE UNDERSIGNED, HEREBY CERTIFY UNDER PENALTY OF LAW, THAT I AM A RESPONSIBLE OFFICIAL, AND THAT I HAVE PERSONALLY EXAMINED, AND AM FAMILIAR WITH, THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ITS ATTACHMENTS. BASED ON MY INQUIRY OF THOSE INDIVIDUALS WITH PRIMARY RESPONSIBILITY FOR OBTAINING THE INFORMATION, I CERTIFY THAT THE STATEMENTS AND INFORMATION IS ON KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE OR INCOMPLETE INFORMATION, INCLUDING THE POSSIBILITY OF FINE OR IMPRISONMENT.</i>																
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center;"> BY:  _____ AUTHORIZED SIGNATURE <u>Greg A. Shiflett</u> _____ TYPED OR PRINTED NAME OF SIGNATORY </td> <td style="width: 50%; text-align: center;"> <u>5/12/26</u> _____ DATE <u>VP Manufacturing</u> _____ TITLE OF SIGNATORY </td> </tr> </table>			BY:  _____ AUTHORIZED SIGNATURE <u>Greg A. Shiflett</u> _____ TYPED OR PRINTED NAME OF SIGNATORY	<u>5/12/26</u> _____ DATE <u>VP Manufacturing</u> _____ TITLE OF SIGNATORY												
BY:  _____ AUTHORIZED SIGNATURE <u>Greg A. Shiflett</u> _____ TYPED OR PRINTED NAME OF SIGNATORY	<u>5/12/26</u> _____ DATE <u>VP Manufacturing</u> _____ TITLE OF SIGNATORY															

Section CC.3: Identification of Emission Units & Each Term or Condition of the Permit***Emission Units in Continuous Compliance***

10a) Emission Units in Continuous Compliance. *The following emission units were in continuous compliance with each permit term or condition(s) and applicable requirements listed here, such as emission standards, emission control requirements, emission testing, court requirements, work practices, or enhanced monitoring, based on the compliance methods specified below. If additional space is required, reproduce this page as needed.*

Emission Unit/Permit ID#	Permit Term, Condition, or Applicable Regulation	Emission Unit Description	Permit Limit or requirement	Actual Emissions or status of requirement	The method used for determining compliance over the reporting period, and whether the method provided continuous or intermittent data. (such as test methods, monitoring procedures, recordkeeping and reporting)
All	All	Site-wide	Yes	In Compliance	Applicable Monitoring, Recordkeeping and Reporting

Section CC.3: Identification of Emission Units & Each Term or Condition of the Permit***Emission Units Subject to Future Compliance Dates***

10b) Emission Units Subject to Future Compliance Dates. *The following emission units will achieve compliance on a timely basis and maintain compliance with future compliance dates as they become applicable during the permit term. If additional space is required, reproduce this page as needed.*

Emission Unit/Permit ID#	Future Compliance Schedule	Emission Unit Description	Reason for Future Compliance Date
None Identified			

Section CC.3: Identification of Emission Units & Each Term or Condition of the Permit***Emission Units Not in Continuous Compliance***

10c)(1) Emission Units Not in Continuous Compliance. *The following emission units were not in continuous compliance with each permit term or condition and applicable requirements listed here, such as emission standards, emission control requirements, emission testing, court requirements, work practices, or enhanced monitoring, based on the compliance methods specified below. If additional space is required, reproduce this page as needed.*

Emission Unit/Permit ID#	Permit Term, Condition, or Applicable Regulation	Emission Unit Description	Permit Limit or Requirement	Actual Emissions or Status of Requirement	The method used for determining compliance over the reporting period, and whether compliance was continuous or intermittent. (such as test methods, monitoring procedures, recordkeeping and reporting)
None					

10c)(2) Emission Units Not in Continuous Compliance. *For the emission units and requirements listed in 10c)(1) that were not in continuous compliance since the last reporting period, state the duration, magnitude, and reason or reasons for non-compliance. Each row of 10c)(2) must relate to the corresponding row of 10c)(1). If additional space is required, reproduce this page as needed.*

Emission Unit/Permit ID#	Description of duration, magnitude, and reason(s) for non-compliance and corrective steps taken or planned.
N/A	

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

DEP7007DD**Insignificant Activities**[Section DD.1: Table of Insignificant Activities](#)[Section DD.2: Signature Block](#)[Section DD.3: Notes, Comments, and Explanations](#)**Source Name:**[U.S. Smokeless Tobacco Company - Eagle One Facility](#)**KY EIS (AFS) #:**

21-

Permit #:[V-20-002](#)**Agency Interest (AI) ID:**[121768](#)**Date:**[May 2026](#)**Section DD.1: Table of Insignificant Activities**

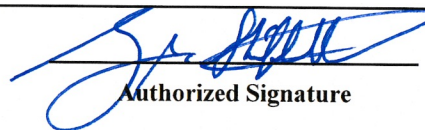
*Identify each activity with a unique Insignificant Activity number (IA #); for example: 1, 2, 3... etc.

Insignificant Activity #	Description of Activity including Rated Capacity	Serial Number or Other Unique Identifier	Applicable Regulation(s)	Calculated Emissions
1	Pressurized propane tanks		None	
2	Small parts cleaners		None	
3	Laboratory fume hoods for physical/chemical analyses		None	
4	Cure Room Heater (1.8 MMBtu/hr natural gas combustion)		None	
5	Cure Bin Washing Operation		None	
6	Rolling Bin Washing Operation		None	

Section DD.2: Signature Block

I, THE UNDERSIGNED, HEREBY CERTIFY UNDER PENALTY OF LAW, THAT I AM A RESPONSIBLE OFFICIAL, AND THAT I HAVE PERSONALLY EXAMINED, AND AM FAMILIAR WITH, THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ITS ATTACHMENTS. BASED ON MY INQUIRY OF THOSE INDIVIDUALS WITH PRIMARY RESPONSIBILITY FOR OBTAINING THE INFORMATION, I CERTIFY THAT THE INFORMATION IS ON KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE OR INCOMPLETE INFORMATION, INCLUDING THE POSSIBILITY OF FINE OR IMPRISONMENT.

By:



Authorized Signature

Greg A. Shiflett

Type/Print Name of Signatory

5/12/20

Date

VP Manufacturing

Title of Signatory