

Commonwealth of Kentucky
Division for Air Quality
STATEMENT OF BASIS / SUMMARY

Title V, Construction/Operating
Permit: V-26-030

U.S. Smokeless Tobacco Company – Eagle One Facility
100 Weyman’s Way
Hopkinsville, KY 42240

July 21, 2026
Ossama Ateyeh, Reviewer

SOURCE ID:	21-047-00139
AGENCY INTEREST:	121768
ACTIVITY:	APE20250001; APE20260001

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SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 2131, Chewing and Smoking Tobacco and Snuff

Single Source Det. ☐ Yes ☒ No If Yes, Affiliated Source AI:

Source-wide Limit ☒ Yes ☐ No If Yes, See Section 4, Table A

28 Source Category ☐ Yes ☒ No If Yes, Category:

County: Christian

Nonattainment Area ☒ N/A ☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☐ Ozone ☐ Lead

If yes, list Classification:

PTE* greater than 100 tpy for any criteria air pollutant ☒ Yes ☐ No

If yes, for what pollutant(s)?

☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☒ VOC

PTE* greater than 250 tpy for any criteria air pollutant ☒ Yes ☐ No

If yes, for what pollutant(s)?

☐ PM₁₀ ☐ PM_{2.5} ☐ CO ☐ NO_x ☐ SO₂ ☒ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) ☐ Yes ☒ No

If yes, list which pollutant(s):

PTE* greater than 25 tpy for combined HAP ☐ Yes ☒ No

*PTE does not include self-imposed emission limitations.

Description of Facility:

The facility includes a Dry Flour Plant, a Tobacco Curing Operation, Tobacco Finishing, Tobacco Packaging, and various support facilities including two Boilers and Three Emergency Engines. The plant receives tobacco stems and leaf to produce cured tobacco that is finished and packaged into smokeless tobacco products at this facility.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: V-26-030

Activities: APE20250001& APE20260001

Received: May 12, 2025 (APE20250001)

Application Complete Date(s): July 11, 2025

Received: May 21, 2026 (APE20260001)

Application Complete Date(s): July 2, 2026

Permit Action: ☐ Initial ☒ Renewal ☒ Significant Rev ☐ Minor Rev ☐ Administrative

Construction/Modification Requested? ☒ Yes ☐ No NSR Applicable? ☐ Yes ☒ No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action ☐ Yes ☒ No

Description of Action:

- *APE20250001 Renewal with addition of second mixer in emission unit 14 with no change in throughput or emissions.*
- *APE20260001 Significant revision to add the following*
 - A. A seventh bulking bin and a fifth cutter and dust collector in Emission Unit 01.*
 - B. A second low moisture into cure mixer (cylinder mixer), and various feed systems in Emission Unit 03.*
 - C. 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.*
 - D. Emission Unit 15 (packing process), a new process, where finished tobacco is packed into cans, pouches and mesh packs*
 - E. Emission Unit 16 (25 kWe emergency generator).*
 - F. Emission Unit 17 (100 kWe emergency generator).*

V-26-030 Emission Summary				
Pollutant	2025 Actual (tpy)	Previous PTE V-20-002 (tpy)	Change (tpy)	Revised PTE V-26-030 (tpy)
CO	0.33	25.36	1.97	27.34
NO _x	11.60	91.1	0.54	91.64**
PT	3.75	24.4	0.46	24.86
PM ₁₀	3.75	24.4	0.46	24.86
PM _{2.5}	3.75	24.4	0.46	24.86
SO ₂	0.02	0.18	0.01	0.19
VOC	32.73	195.3	20.7	216*
Lead		0		
Greenhouse Gases (GHGs)				
Carbon Dioxide	4847	61,450	-17,597	41,905
Methane	0.09	0.68	0	0.68
Nitrous Oxide	0.08	3.0	0.26	2.96
CO ₂ Equivalent (CO ₂ e)		62,349	-17,594	42,707
Hazardous Air Pollutants (HAPs)/Toxic Air Pollutants				
Ammonia	14.94	75.23	17.52	92.75
Combined HAPs:		0.223	0.025	0.248

*Source-wide limits for VOC (216 tpy) based on facility taking a limit on the annual processing rate at various emission units.

** NO_x potential emissions reduce to 91.64 tpy after VOC source-wide throughput limitations are placed on the facility.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Unit 01 (101) – Dry Flour Casing and Cutting Process							
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factors Used (Eng. Estimate)				Compliance Method
VOC	Source-wide 216 tpy	401 KAR 51:017	Facility ID	Control	VOC EF (lb/ton)	PM EF (lb/ton)	Maximum throughput of 22,482 tons total tobacco during any 12 consecutive months of which 21,900 tpy of stems can be processed
			BH0101	BH0101	0.031	1.714	
			CS0101	N/A	0.089	0.14	
			CS0102 & CS0103	N/A	0.017	0.02	
			BH0102	BH0102	0.012	1.286	
			DC0101	N/A	0.039	0.061	
			BH0103	BH0103	0.195	2.143	
			CC0101	N/A	0.063	0.061	
PM	20% Opacity	401 KAR 59:010, Section 3(1)(a)	SI0101 through SI0107	N/A	N/A	0.061	conduct qualitative visual observation on a Weekly Basis
	2.34 lb/hr for $P \leq 0.50$, or $E = 3.59P^{0.62}$ for $0.50 < P \leq 30$	401 KAR 59:010, Section 3(2)	CF0101 through CF0105	BH0104 TO BH0108	0.011	0.131	
			TF0101	N/A	N/A	0.086	Compliance assumed while control devices in operation
			TD0101	N/A	N/A	0.086	

Initial Construction Date: 2015;
A seventh bulking bin (1) a fifth cutter(1) and BH0108 a dust collector added in 2027

Process Description:
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 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.

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 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.

The resulting product is transferred to Emission Unit 02 (102) Dry Flour Drying Process

Emission Unit 01 (101) – Dry Flour Casing and Cutting Process

KYEIS Designation (Facility Designation)	Description	Rated Capacity (tons/hr)	Control Equipment & Efficiency
BH0101	Stem Dumper and Shaker	2.5	Dust Collector, 90%
CS0101	Stem Conditioning Cylinder	2.5	None
CS0102 (CS0102 & CS0103)	Two Vacuum Chambers	12 (Total)	None
BH0102	Lamina Feeder Dry Material	12	Dust Collector, 90%
DC0101	Lamina Feeder Wet Materials	12	None
BH0103	Tobacco Sorter, Hogshead Picker, & Conveyors	12	Dust Collector, 90%
CC0101	Casing Cylinder	12	None
BC0101 (SI0101 to SI0107)	Seven Bulking Bins	12 (Total)	None
CF0101 (CF0101 to CF0107)	Five Cutters	12 (Total)	Five Dust Collectors, 90% Each (BH0104 to BH0108)
TF0101	Tote Filling Station	12	None
TD0101	Add Back Station	12	None

Applicable Regulation:

401 KAR 50:012, General application.

401 KAR 59:010, New process operations, applicable to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates in 401 KAR Chapter 59, commenced on or after July 2, 1975.

Precluded Regulation:

401 KAR 51:017, *Prevention of significant deterioration of air quality*, precluded due to source-wide emission limits taken by the facility for VOC (216 tpy).

Comments:

Hours of operation and amount of tobacco processed (in tons) shall be monitored and recorded on a monthly and a rolling 12-month basis. Records of control equipment maintenance shall be maintained. The significant revision APE20260001 added bulking bin, cutters and a dust collector to this emission unit.

Uncontrolled Emission factors for the following units are calculated based on outlet grain loading, air flow rate and conservative control efficiency:

(BH0101) Stem Dumper and Shaker: 1.714 lb/ton

air flow (scfm) = 5000 scfm, outlet grain loading of 0.01 gr/scf and control efficiency of 90%.

(BH0102) Lamina Feeder Dry Material: 1.286 lb/ton

air flow (scfm) = 9000 scfm, outlet grain loading of 0.02 gr/scf and control efficiency of 90%.

(BH0103) Tobacco Sorter, Hogshead Picker, Conveyors: 2.143 lb/ton

air flow (scfm) = 30,000 scfm, outlet grain loading of 0.01 gr/scf and control efficiency of 90%.

(CF0101) Five Cutters: 0.131 lb/ton

air flow (scfm) = 920 scfm, outlet grain loading of 0.02 gr/scf and control efficiency of 90%.

Emission Unit 01 (101) – Dry Flour Casing and Cutting Process

Uncontrolled Emission factors for the following units are calculated based on stack test at other facilities and conservative control efficiency (if controlled):

(CS0101) Stem Conditioning Cylinder Stack Test [0.000007 lb PM / lb tobacco (stack test-controlled EF)] and control efficiency of 75%.

(CS0102 & CS0103) Two Vacuum Chambers (other Altria site) [0.00000923 lb PM / lb tobacco (stack test EF)]

Uncontrolled Emission factors for the following units are calculated based on AP-42 emission factor for similar processes and conservative control efficiency (if controlled):

(DC0101) Lamina Feeder Wet Materials AP-42 for similar process, Uncontrolled grain handling, = 0.061 lbs PM / ton throughput.

(CC0101) Casing Cylinder AP-42 for similar process, Uncontrolled grain handling, = 0.061 lbs PM / ton throughput.

(BC0101) (S10101 – S10107) Seven Bulking Bins AP-42 for similar process, Uncontrolled grain handling = 0.061 lbs PM / ton throughput.

(TF0101) Tote Filing Station AP-42 for similar process AP-42, Uncontrolled grain loading to truck = 0.086 lbs PM / ton throughput.

(TD0101) Add Back Station AP-42 for similar process AP-42, Uncontrolled grain loading to truck = 0.086 lbs PM / ton throughput.

Emission Unit 02 (102) – Dry Flour Drying Process						
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factors Used (Eng. Estimate)			Compliance Method
VOC	Source-wide 216 tpy	401 KAR 51:017	Facility ID	VOC EF (lb/ton)	PM EF (lb/ton)	Maximum throughput of 22,482 tons total tobacco during any 12 consecutive months 11,241 DDL Drying Line 102B & 11,241 tons /yr 102 A
			Fluidized Bed Drying Line 102A			
			DF0201	2.1	4	
			BH0201	0.039	0.43	
PM	20% Opacity	401 KAR 59:010, Section 3(1)(a)	BH0202	0.169	1.371	Conduct qualitative visual observation on a Monthly Basis
			SI0201-SI0202	.017	0.513	
	2.34 lb/hr for P≤0.50, or 3.59P ^{0.62} for 0.50<P≤30	401 KAR 59:010, Section 3(2)	TP0209 Is (TP0201)	Emission is Shared with Silo		Compliance assumed while control devices in operation
			DLL Drying Line 102B			
			DA0201	0.308	1	
			BH0205	0.169	1.371	
			SI0203-SI0204	0.017	0.513	
			TP020X Is (TP0202)	Emission is Shared with Silo		

Initial Construction Date: 2015

Process Description:
 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.

The Fluidized bed Drying Line 102A: 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

Emission Unit 02 (102) – Dry Flour Drying Process

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. 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 (SI0203-4) or a truck filling station equipped with a dust collector BH0207).

KYEIS Designation (Facility Designation)	Description	Control Equipment & Efficiency
<i>Fluidized Bed Drying Line 102A</i>		
DF0201	102A Fluidized Bed Dryer	Cyclone (CY0201), 75%
BH0201	102A Fluidized Bed Dryer Dust Return	Baghouse, 96%
BH0202	102A Global Dust Collector (Conveyors, Sifting, Tote Filling, and Surge Silo)	Baghouse, 90%
SI0201- SI0202	(Silos)	Baghouse (BH0202), 96%
TP0209 (TP0201)	102A Truck Filling	Baghouse (BH0204), 96%
<i>DLL Drying Line 102B</i>		
DF0202 (DA0201)	102B DLL Dryer	Cyclone (CY0202), 75%
BH0205	102B Global Dust Collector (Conveyors, Sifting, Tote Filling, and Surge Silo)	Baghouse, 90%
SI0203- SI0204	(Silos)	Baghouse (BH0205), 96%
TP020X (TP0202)	102B Truck Filling	Baghouse (BH0207), 96%

Applicable Regulation:

401 KAR 50:012, General application.

401 KAR 59:010, New process operations, applicable to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates in 401 KAR Chapter 59, commenced on or after July 2, 1975.

Precluded Regulation:

401 KAR 51:017, *Prevention of significant deterioration of air quality*, precluded due to source-wide emission limits taken by the facility for VOC (216 tpy).

Comments:

The Global Dust Collector Dust Return was never constructed; an enclosed conveyor system (BH0201) and (BH0202) are used to recycle dust back into the system (APE20160003). The emission points BH0203 and BH0206 were removed from this emission unit (V-14-014 R2).

The significant revision adds S10201, S10202, S10203, and S10204 Silos, with BH0204, BH0205, and BH0207 Dust collectors.

Emission Unit 02 (102) – Dry Flour Drying Process

The maximum throughput for 102A and 102B is 11,241 tpy, each.

Hours of operation and amount of tobacco processed (in tons) shall be monitored and recorded on a monthly and a rolling 12-month basis. Records of control equipment maintenance shall be maintained.

Uncontrolled Emission factors for the following units are calculated based on outlet grain loading, air flow rate and conservative control efficiency:

(BH0201) Fluidized Bed Dryer Dust Return: 0.429 lb/ton

air flow (scfm) = 500 scfm, outlet grain loading of 0.02 gr/scf and control efficiency of 96%.

(BH0202) Conveyors, Sifting, Tote Filling, and Surge Silo: 1.371 lb/ton

air flow (scfm) = 4000 scfm, outlet grain loading of 0.02 gr/scf and control efficiency of 90%.

(SI0201-2 & TP0209) Silos with Dust Collector & Truck Filling: 0.513 lb/ton

air flow (scfm) = 500 scfm, outlet grain loading of 0.02 gr/scf and control efficiency of 96%.

(BH0205) (Global Dust Collector) Conveyors, Sifting, Tote Filling, and Surge Silo: 1.371 lb/ton

air flow (scfm) = 4000 scfm, outlet grain loading of 0.02 gr/scf and control efficiency of 90%.

(SI0203-4)(TP020X) (TP0202) Silos Filling-Truck Filling: 0.513 lb/ton

air flow (scfm) = 500 scfm, outlet grain loading of 0.02 gr/scf and control efficiency of 96%.

Uncontrolled Emission factors for the following units are calculated based on stack test at other facilities and conservative control efficiency (if controlled):

Dry Flour Drying Process 102A

(DF0201) Fluidized Bed Dryer stack test with engineering adjustment [0.3 lbs/ton from stack test rounded up to 1 lb/ton] and control efficiency of 75%.

Dry Flour Drying Process 102B

(DF0202) DLL Dryer stack test with engineering adjustment [0.23 lbs/ton from stack test rounded up to 0.25 lb/ton] and control efficiency of 75%.

Emission Unit EU3 (103) – Into Cure Process				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
VOC	Source-wide 216 tpy	To preclude 401 KAR 51:017	3.116 lb/ton (Mass Balance)	Maximum throughput of 29,976 tons total tobacco mixture during 12 consecutive months
PM	2.34 lb/hr for $P \leq 0.50$, or $3.59P^{0.62}$ for $0.50 < P \leq 30$	401 KAR 59:010, Section 3(2)	0.229 lb/ton (Mass Balance)	
Initial Construction Date: 2015 (4 rotary batch mixers and blending/storage tanks) and (cylinder mixer) 2017 2 Cylinder Mixers, 2 Tote Dumpers and 2 Use Hoppers venting to (BH0301) Dust collector being added in 2027				
Process Description: The Cure Process involves mixing Dry Flour tobacco with a curing solution and 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 four batch mixers that receive cased and cut tobacco. 2 Cylinder mixers 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 into each mixer, cure and flavor solution is applied. After the application of the curing and flavor solution, the mixture is then 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. Maximum rated capacity = 22.1 ton/hr / 44,200 lb/hr total.				
Applicable Regulation: 401 KAR 50:012 , General application. 401 KAR 59:010 , New process operations, applicable to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates in 401 KAR Chapter 59, commenced on or after July 2, 1975.				
Precluded Regulation: 401 KAR 51:017 , <i>Prevention of significant deterioration of air quality</i> , precluded due to source-wide emission limits taken by the facility for VOC (216 tpy).				
Comments: Hours of operation and total amount of tobacco processed (in tons) shall be monitored and recorded on a monthly and rolling 12-month basis. EU3 (103) is limited in the permit to 29,976 tons per year of total tobacco. Uncontrolled PM Emission factor for EU03 is calculated based on outlet grain loading of 0.02 gr/scf, air flow rate of 500 scfm and conservative control efficiency of 90%.				

Emission Unit EU3 (103) – Into Cure Process

VOC Emission Factor Basis is Loss of Ethanol Applied in Into Cure Mixers

Ethanol is applied at a rate of 6.7 lbs per ton of into cure tobacco mixture. Tobacco testing allowed for a mass balance to determine the percentage of the ethanol applied that is emitted versus the amount that remains in the product after curing (i.e., exiting EU04). The worst-case emission rate was 93% lost (with 7% ethanol remaining in the product exiting EU04). Of the 93% ethanol lost, it is assumed that half of the ethanol flashes off during application (in EU03) and the other half of the 93% is lost during the curing cycle EU4.

Emission Unit EU4 (104) – Cure Process				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factors Used (Eng. Estimate)	Compliance Method
VOC	Source-wide 216 tpy	To preclude 401 KAR 51:017	4.093 lb/ton	Maximum throughput of 29,976 tons total tobacco mixture during any 12 consecutive months
			3.29 lb/ton	
Initial Construction Date: 2015				
Process Description: 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 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 Maximum Rated Capacity: 30 ton/hr or 60,000 lbs/hr RTO (for odor control) Primary Fuel: Propane RTO (for odor control) Secondary Fuel: Natural Gas				
Applicable Regulation: 401 KAR 50:012, <i>General application</i> 401 KAR 53:010, <i>Ambient air quality standards</i>				
State Origin Requirement: 401 KAR 63:020, <i>Potentially hazardous matter or toxic substances</i> , applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances which may be harmful to the health and welfare of humans, animals, and plants, including, but not limited to, antimony, arsenic, bismuth, lead, silica, tin, and compounds of such materials, provided such emissions are not elsewhere subject to the provisions of the administrative regulations of the DAQ.				
Precluded Regulation: 401 KAR 51:017, <i>Prevention of significant deterioration of air quality</i> , precluded due to source-wide emission limits taken by the facility for VOC (216 tpy).				
Comments: EU4 (104) is limited in the permit to 29,976 tons per year of total tobacco.				

Emission Unit EU4 (104) – Cure Process

Hours of operation, total amount of tobacco mixture processed (in tons), the type, and the amount of fuel combusted (in Mgal for propane and in MMscf for NG) shall be monitored and recorded on a monthly and rolling 12-month basis.

Emission Unit EU4 - VOC Emission Factor Basis (all in lb/ton)

Ethanol Applied per ton (6.7); Percent Lost (93%); Portion of Ethanol lost in EU3 and EU4 50%; Amount of Ethanol lost in EU4 (46.5%) Calculated Uncontrol Emission Factor (3.116)

Loss of Ethanol Applied Into Cure Mixers +Tobacco volatiles = 13.5% relative to the 6.7 lbs/ton ethanol applied based on sampling + HAPs (0.013) + VOC from Staging (0.051) + Fuel VOC from propane (0.008) = 4.093 lbs/ton

Emission Unit #5 (105) and 6 (106) – Boiler #1 and #2				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factors Used and Basis	Compliance Method
PM	0.36 lb/MMBtu	401 KAR 59:015, Section 4(1)(c)	NG: 13.77 lb/MMscf (Manufacturer Specs.) Propane: 0.7 lb/Mgal (AP-42, Table 1.5-1)	Compliance Assumed
	20% Opacity	401 KAR 59:015, Section 4(2)		
SO ₂	1.39 lb/MMBtu	401 KAR 59:015, Section 5(1)(c)2.b.	NG: 0.61 lb/MMscf (Manufacturer Specs.) Propane: 0.055 lb/Mgal (AP-42, Table 1.5-1)	
Initial Construction Date: 2015				
Process Description: Two 32.659 MMBtu/hr boilers combust propane (primary) or natural gas (secondary) to provide steam for process and building heat.				
Applicable Regulation: 401 KAR 50:012, General application				
401 KAR 59:015, New indirect heat exchangers, applicable to an indirect heat exchanger having a heat input capacity greater than 1 MMBtu/hr and less than 250 MMBtu/hr commenced on or after April 9, 1972.				
401 KAR 60:005, Section 2(2)(d), 40 CFR 60.40c through 60.48c (Subpart Dc), Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, applicable to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than 10 MMBtu/hr.				
Comments: The type and amount of fuel combusted (in Mgal for propane and in MMscf for NG) shall be monitored and records maintained on a monthly basis.				
Emission Factors for Natural Gas was calculated based on the Manufacture Specs For PM, PM ₁₀ , SO ₂ , NO _x , CO, VOC, and AP-42 Tables 1.4-2, 1.4-3 for the remaining pollutants. For Propane AP-42, Table 1.5-1 was used for all pollutants.				

Emission Unit #12 (112) – Pesticide Fogging				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
VOC	Source-wide 216 tpy	To preclude 401 KAR 51:017	0.253 lb/gal (MSDS)	Maximum throughput of 4,320 gallons total pesticide usage during 12 consecutive months
Initial Construction Date: 2015 Process Description: Pesticide fogging is conducted in 3 processing buildings to control pests that could possibly destroy tobacco. Maximum Operating Schedule: 576 hr/yr, total Maximum Rated Capacity: 7.5 gal/hr, total Pesticide: Vectrin 3% Applicable Regulation: 401 KAR 50:012, <i>General application</i>. Precluded Regulations: 401 KAR 51:017, <i>Prevention of significant deterioration of air quality</i>, precluded due to source-wide emission limits taken by the facility for VOC (216 tpy). Comments: Hours of operation and amount of pesticide used (in gal) shall be monitored and records maintained on a monthly and rolling 12-month basis. Emission Factors was based on Engineering Calculation based on the MSDS Pesticide Fogging Mass Balance (from SDS): Pesticide – Vectrin 3%: Specific gravity = 1.012, VOC < 3% 1 gallon x density (8.34 lbs/gal x 1.012) x VOC content (3 lbs VOC / 100 lbs) = 0.253 lb/gallons				

Emission Unit #13 (113) – Emergency Fire Pump				
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factors Used (Manufacturer Specs.)	Compliance Method
NMHC + NO _x	4.0 g/kW-hr (3.0 g/HP-hr)	40 CFR 60.4205(c)	120.54 lb/Mgal	Purchase certified engines; Install & configure according to Mfr's specs; Operate & maintain engine according to Mfr's instructions
CO	3.5 g/kW-hr (2.6 g/HP-hr)		20.16 lb/Mgal	
PM	0.20 g/kW-hr (0.15 g/HP-hr)		2.69 lb/Mgal	
Initial Construction Date: 2015				
Process Description: Clark JU6H-UFADR9 250 hp Diesel Emergency Fire Pump				
Applicable Regulation: 401 KAR 60:005 , Section 2(2)(oooo) 40 CFR 60.4200 through 60.4219, Tables 1 through 8 (Subpart III), <i>Standards of Performance for Stationary Compression Ignition Internal Combustion Engines</i> , applicable to owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are manufactured as a certified NFPA fire pump engine after July 1, 2006. 401 KAR 63:002 , Section 2(4)(eeee) 40 CFR 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (Subpart ZZZZ), <i>National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</i> , applicable to a stationary RICE at an area source of HAP emissions				
Comments: The location, hours of operation, and amount of fuel combusted (in gal) shall be monitored and records maintained on a monthly basis. The emergency pump is stored at the 1600 North Main Street facility in Hopkinsville, KY but can be used at the Eagle One facility if required (APE20160003). Records of ULSD fuel certification from the fuel supplier shall be maintained. The emission factors for the Engine was calculated based on Manufacturer Specs for PM, PM ₁₀ , NO _x , and CO and from AP 42 Table 3.3-2 for the other pollutants.				

Emission Unit #14 (114) – Tobacco Finishing Process					
Pollutant		Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
VOC	Cure Bin Dumpers	Source-wide 216 tpy	To preclude 401 KAR 51:017	3.2348 lb/ton (Eng. Estimate)	Maximum throughput of 39,100 tons total finished tobacco during any 12 consecutive months
VOC	Tobacco Pre Conditioner			0.0246 (Eng. Estimate)	Maximum throughput of 2,190 tons total finished tobacco during any 12 consecutive months
Initial Construction Date: 2017					
Process Description: Cured tobacco enters the process from EU 04 (14) or from. 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. Maximum Rated Capacity: 24,000 lbs/hr of finished tobacco Dry Pre Conditioner Maximum Rated Capacity 500 lbs/hr.					
Applicable Regulations: 401 KAR 50:012, <i>General application.</i>					
Precluded Regulations: 401 KAR 51:017, <i>Prevention of significant deterioration of air quality</i> , precluded due to source-wide emission limits taken by the facility for VOC (216 tpy).					
Comments: Hours of operation and the amount of finished tobacco processed (in tons) shall be monitored and records maintained on a monthly and rolling 12-month basis. Emission Factors used in the calculation is based on Engineering Estimates.					

Emission Unit #14 (114) – Tobacco Finishing Process

Ethanol is applied at a rate of 6.69 lbs per ton of finished tobacco. Tobacco testing allowed for a mass balance to determine the percentage of the ethanol applied that is emitted during finishing. The worst case was 48% lost.

Calculated Uncontrolled Emission $[6.69 \times 48\%] = 3.211$

Tobacco Volatiles = 0.0236 lbs VOC/ton of finished Tobacco based on sampling.

Total VOC = $3.211 + 0.0236 = 3.235$ lbs/ton

Emission Unit #15 (115) – Tobacco Packing Process

Pollutant		Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
VOC	Rolling Dumpers	Source-wide 216 tpy	401 KAR 51:017	0.83 lb/ton (Eng. Estimate)	Maximum throughput of 15.4 tons/hr total finished tobacco during any 12 consecutive months
VOC	Equipment Cleaner			2000 (Eng. Estimate)	Maximum throughput of 0.0354 tons/hr total for equipment cleaning during any 12 consecutive months

Initial Construction Date: 2027

Process Description:

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 pouches, and 1 mesh pack). VOC emissions from the packing operation are comprised of a portion of 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 spirit and ethanol-based alcohol used.

Maximum Rated Capacity for Tobacco Packing : 30.800 lbs/hr of finished tobacco

Maximum Rated Capacity for Equipment Cleaning 70.73 lbs/hr.

Applicable Regulations:

401 KAR 50:012, *General application*.

Precluded Regulations:

401 KAR 51:017, *Prevention of significant deterioration of air quality*, precluded due to source-wide emission limits taken by the facility for VOC (216 tpy).

Comments:

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

Emission Unit #15 (115) – Tobacco Packing Process

potential emissions. Hours of operation and the amount of finished tobacco processed (in tons) shall be monitored and records maintained on a monthly and rolling 12-month basis.

Emission Factors EU15 packing equipment cleaning is [2,000 lbs/ton of solvent used]. This conservatively assumes 100% of the material used will be emitted as VOC emissions.

PTE calculation: For Cleaning

[4.73 tons used] x [2,000 lbs/ton] = 9,460 lbs emitted

9,460 lbs emitted x 1 ton/2,000 lbs = 3.7 tpy VOC emissions.

Emission Unit 15 - VOC Emission Factor Basis

Ethanol is applied at a rate of 6.69 lbs per ton of finished tobacco. Tobacco testing allowed for a mass balance to determine the percentage of the ethanol applied that is emitted during packing. The worst case was 12% lost.

Ethanol per ton x Ethanol lost = Uncontrolled Emission Factor

6.69 x 12% = 0.803 lbs/ton

Emission Unit EU16-25 kW & E17 – 100 kW Natural Gas-Fired Emergency Engines					
Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis		Compliance Method
NO _x + HC	10.0 g/hp-hr	40 CFR 60.4233(d) for EU16	EU16 2254.2	AP-42 Table 3.2-3	Refer to Comments section
NO _x VOC	2.0 g/kW-hr 1.0 g/kW-hr	40 CFR 60.4233(e) for EU 17	EU17 478.68*	40 CFR Table 1	
CO	387 g/hp-hr	40 CFR 60.4233(d) for EU16	EU16 3794.4	AP-42 Table 3.2-3	Refer to Comments section
	4.0 g/kW-hr	40 CFR 60.4233(e) for EU17	EU17 957.36	40 CFR Table 1	
Process Description:					
Equipment	Model	Rated Capacity		Construction Date	
EU16	Kohler 25CCLOr Equivalent	64.0 hp		2027	
EU17	Kohler KG100R	204.0hp		2027	
Applicable Regulation:					
401 KAR 60:005, Section 2(2)(pppp), 40 C.F.R. 60.4230 through 60.4248, Tables 1 through 4 (Subpart JJJJ), <i>Standards of Performance for Stationary Spark Ignition Internal Combustion Engines</i> are applicable to manufacturers, owners, and operators of stationary spark ignition internal combustion engines.					
401 KAR 63:002, Section 2(4)(eeee), 40 C.F.R. 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (Subpart ZZZZ), <i>National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</i> is applicable to owners and operators of stationary RICE at a major or area source of HAP emissions.					
Comments:					
Both Engines are Proposed not purchased yet. However, the missing information will be completed by the company in a revision such as the stack information’s and final model purchased.					
*Emission factors used are from AP-42; Table 3.2-3 & 40 CFR 98, Subpart C-1 and C-2.					
Compliance may be demonstrated by purchasing an engine certified according to procedures in 40 CFR 60, Subpart JJJJ and demonstrating compliance according to one of the methods specified in 40 CFR 60.4243(a).					

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements\Results

N/A

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

Emission and Operating Limit	Regulation	Emission Unit
216 tpy VOC emissions	Preclude being a major source under PSD	Source wide

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 59:010 , <i>New process operations</i>	01, 02 & EU3
401 KAR 50:012 , <i>General application</i>	01, 02, EU3, EU4, EU5, EU6, EU12, EU14, & EU15
401 KAR 59:015 , <i>New indirect heat exchangers</i>	EU5 & EU6
401 KAR 63:020 , <i>Potentially hazardous matter or toxic substances</i>	EU4 EU14 & EU15
401 KAR 60:005, Section 2(2)(d) , 40 CFR 60.40c through 60.48c (Subpart Dc), <i>Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units</i>	EU5 & EU6
401 KAR 60:005, Section 2(2)(oooo) , 40 CFR 60.4200 through 60.4219, Tables 1 through 8 (Subpart IIII), <i>Standards of Performance for Stationary Compression Ignition Internal Combustion Engines</i>	EU13
401 KAR 60:005, Section 2(2)(pppp) , 40 C.F.R. 60.4230 through 60.4248, Tables 1 through 4 (Subpart JJJJ), <i>Standards of Performance for Stationary Spark Ignition Internal Combustion Engines</i>	EU16 & EU17
401 KAR 63:002, Section 2(4)(eeee) , 40 CFR 63.6580 through 63.6675, Tables 1a through 8, and Appendix A (Subpart ZZZZ), <i>National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</i>	EU13, EU16 & EU17

Table C - Summary of Precluded Regulations:

Precluded Regulations	Emission Unit
401 KAR 51:017 , <i>Prevention of significant deterioration of air quality</i>	SOURCE - WIDE

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS (CONTINUED)

Table D - Summary of Non-Applicable Regulations:

N/A

Air Toxic Analysis

401 KAR 63:020, Potentially Hazardous Matter or Toxic Substances

The Division for Air Quality (Division) has performed SCREEN View on March 3, 2020, and AERMOD on March 6, 2020, of potentially hazardous matter or toxic substances (Ammonia) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Based upon this information, the Division has determined that the conditions outlined in this permit will ensure compliance with the requirements of 401 KAR 63:020.

There is no change in the RSL value and no increase in ammonia emissions in this renewal.

Single Source Determination

N/A

SECTION 5 – COMPLIANCE ASSURANCE MONITORING

40 CFR 64, *Compliance assurance monitoring* (CAM) applies to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 CFR 64.2(b)(1);
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- (3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

Emission Unit	Equipment Ref. No.	Equipment	Control Device Ref. No.	Criteria 1 (Y)	Criteria 2 (Y)	Criteria 3 (Y)	Does CAM apply? If Y for criteria 1, 2, AND 3, then Yes, Otherwise, No.
01 (101) Dry Flour Casing and Cutting Process	BH0101	Global Dust Collector (Stem Dumper and Shaker)	BH0101	Y	Y	N	No
	BH0102	Global Dust Collector (Lamina Feeder EU03 Tote Dumper and Use Hoppers)	BH0102	Y	Y	N	No
	BH0103	Global Dust Collector (Hogshead Picker, Sorters and Conveyors)	BH0103	Y	Y	N	No
	CF0101-CF0105	Cutters	BH0104-BH0107	Y	Y	N	No
02(102) Dry Flour Drying	DF0201	Fluidized Bed Dryer	CY0201	Y	Y	N	No
	BH0201	Fluidize Bed Dryer Dust	BH0201	Y	Y	N	No

Process A		Return					
	BH0202	Global Dust Collector (Conveyors, Sitting, Tote Filling, and Surge Silo)	BH0202	Y	Y	N	No
	SI0201–SI0202	Silo Filling	BH0204	Y	Y	N	No
	TP0201	Truck Filling					
EU3 (102B) Dry Flour Drying Process B	DA0201	DLL Dryer	CY0202	Y	N	N	No
	BH0205	Global Dust Collector (Conveyors, Sitting, Tote Filling, and Surge Silo)	BH0205	Y	Y	N	No
	SI0203-SI0204	Silo Filling	BH0207	Y	Y	N	No
	TP0202	Truck Filling					
EU3 (103) Into Cure Process	BH0301	Dust Collector (Tote, Dumper and Use Hoppers)	BH0301	Y	N	N	No

* If Yes, CAM applies for any of the emission units above, then see further clarification for each listed emission unit in **Section 3**.

SECTION 6 – PERMITTING HISTORY

Permit	Permit Type	Activity #	Complete Date	Issuance Date	Summary of Action	PSD/Syn Minor
V-14-014	Initial	APE20140002	8/4/2014	1/27/2015	Initial Construction Permit	Syn Minor
V-14-014 R1	Minor Revision	APE20150001	3/20/2015	7/30/2015	Changes to EU1 through EU6; Delete EU7; Add EU13	
V-14-014 R2	Sig Revision	APE20160003	1/13/2017	3/28/2017	Changes to EU2 through EU5; Add EU14; Incr. VOC emission limit (tpy)	
V-20-002	Renewal	APE20190003	1/23/2020	12/6/2020	Emergency Engine EU08-11 Was Removed Source Wide VOC Emission Limitation was Imposed	

SECTION 7 – PERMIT APPLICATION HISTORY
N/A

APPENDIX A – ABBREVIATIONS AND ACRONYMS

AAQS	– Ambient Air Quality Standards
BACT	– Best Available Control Technology
Btu	– British thermal unit
CAM	– Compliance Assurance Monitoring
CO	– Carbon Monoxide
Division	– Kentucky Division for Air Quality
ESP	– Electrostatic Precipitator
GHG	– Greenhouse Gas
HAP	– Hazardous Air Pollutant
HF	– Hydrogen Fluoride (Gaseous)
MSDS	– Material Safety Data Sheets
mmHg	– Millimeter of mercury column height
NAAQS	– National Ambient Air Quality Standards
NESHAP	– National Emissions Standards for Hazardous Air Pollutants
NO _x	– Nitrogen Oxides
NSR	– New Source Review
PM	– Particulate Matter
PM ₁₀	– Particulate Matter equal to or smaller than 10 micrometers
PM _{2.5}	– Particulate Matter equal to or smaller than 2.5 micrometers
PSD	– Prevention of Significant Deterioration
PTE	– Potential to Emit
SO ₂	– Sulfur Dioxide
TF	– Total Fluoride (Particulate & Gaseous)
VOC	– Volatile Organic Compounds

APPENDIX B – INDIRECT HEAT EXCHANGER EMISSIONS LIMITATIONS

EU	Fuel	Capacity (MMBtu/hr)	Construction Date	Notes/Removal Date	Basis for PM Limit	Total Heat Input Capacity for PM Limit (MMBtu/hr)	Basis for SO₂ Limit	Total Heat Input Capacity for SO₂ Limit (MMBtu/hr)
EU5	Propane Gas (Primary) Natural Gas (Secondary)	32.659	2014	N/A	401 KAR 59:015, Section 4(1)(c)	0.36	401 KAR 59:015, Section 5(1)(c)2.b.	1.39
EU6	Propane Gas (Primary) Natural Gas (Secondary)	32.659	2014	N/A	401 KAR 59:015, Section 4(1)(c)	0.36	401 KAR 59:015, Section 5(1)(c)2.b.	1.39