REGION 3

PHILADELPHIA, PA 19103

Report Title:	Clean Air Act Inspection of Altria Compounds LLC		
Inspection Date(s):	03/18/2025		
Regulatory Program(s):	Title V Permit, NSPS, MACT		
Company Name:	Same as below		
Facility Name:	Altria Compounds LLC		
Facility Location:	2200 Bells Rd, Richmond, VA 23234		
Latitude:	37.472043	**Longitude:**	-77.43608
County/Parish:	City of Richmond		
ICIS-Air Number:	VA0000005176000515		
Permit Number:	VA0000005176000515		
NAICS Code:	312230, 325199	**SIC:**	N/A
DSB ID #:	ECAD-5684		

Facility Representatives: **Point of Contact**

Maurice Chemweno, Environmental Engineer ☒
Phone: 573-230-5557 Email: maurice.k.chemweno@altria.com
Lawrence Heyd, Sr. Environmental Engineer ☐
Phone: 804-864-6578 Email: lawrence.e.heyd@altria.com

EPA Inspectors:

Steve Ott, Life Scientist, 3ED21
Phone: 215-814-2267 Email: ott.steven@epa.gov
Kyle Krall, Environmental Engineer, 3ED21
Phone: 215-814-2156 Email: krall.kyle@epa.gov
Stafford Stewart, Environmental Engineer, 3ED21
Phone: 215-814-5352 Email: stewart.stafford@epa.gov

State/Local Inspectors:

Gabrielle Huerta, Air Compliance Inspector
Phone: 804-385-7118 Email: Gabrielle.huerta@deq.virginia.gov
Amy Kasper, Enforcement Coordinator
Phone: 804-718-5039 Email: Amy.kasper@deq.virginia.gov

DSB ID #: ECAD-5684

See Attachment 3 – Sign in Sheet for full list of names of attendees

EPA Lead Inspector Signature	KYLE KRALL Digitally signed by KYLE KRALL Date: 2025.04.03 14:55:56 -04'00'	
	Kyle Krall 1600 John F Kennedy Blvd Philadelphia, PA 19103-2852	**Date**
Supervisor Signature	KRISTEN HALL Digitally signed by KRISTEN HALL Date: 2025.04.07 06:03:30 -04'00'	
	Kristen Hall	**Date**

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at Altria Compounds LLC (Altria or Facility) to verify compliance with applicable State and Federal regulations. The VADEQ was notified of the inspection on March 3rd, 2025, via email. On March 14th, 2025, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Maurice Chemweno, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in Section A. Summary of the Facility.

A. Summary of the Facility

The Facility is located at 2200 Bells Rd Richmond, VA. Altria creates the filler powder for "on!" brand nicotine pouches. NAICS codes are 312230, 325199. The facility received a synthetic minor operating permit from VADEQ issued on February 1st, 2023.

Altria Compounds LLC is classified as a synthetic minor for criteria pollutants, particulate matter (PM) and volatile organic compounds (VOC). The Facility is potentially subject to 40 C.F.R. Part 63, Subpart ZZZZ and 40 C.F.R. Part 60, Subpart IIII.

B. Inspection Opening Conference

At 9:00 AM on March 18, 2025, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Altria was represented by Environmental Engineer Maurice Chemweno, Director Jamie Schmidt, Principal Engineer Derek Mueller, Sr. Environmental Engineer Lawerence Heyd, and Sr. Manager Curtis Davis. Also, Gabrielle Huerta and Amy Kasper from VADEQ were present. EPA inspectors, Kyle Krall, Steve Ott, and Stafford Steward presented their credentials at the security office and were escorted to a conference room on site. EPA explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, Maurice Chemweno did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

The site began operation nearly 50 years ago and is currently owned by Phillip Morris. Altria leases their land from Phillip Morris and has operated since 2021 on the premises. The direct materials warehouse (DMW) and mixing operation have been in place since 2021. Altria currently has 24 employees on site and operates 24 hours a day for five days a week (Monday-Friday). At the time of the opening conference, the facility was unable to determine the acreage of their property but noted they will provide EPA with that information as soon as possible.

Altria Compounds LLC operates a smokeless tobacco-leaf-free (STLFP) process and manufactures flavored tobacco derived nicotine powders. The Facility's general process starts with the arrival of wet and dry ingredients including nicotine salt and ethanol for flavoring. The dry materials are stored in the DMW, and the wet ingredient (ethanol) is stored in an underground 12,000 gal storage tank. This tank is an insignificant source in the permit. 2 tanks were observed outside the facility that are used for storing ethanol. These exchange tanks are listed as insignificant sources in the Facility permit and are described as Flavor Tanks. The DMW has a dry mixing area and two wet mixing areas. The dry ingredients are vacuum conveyed to the mixing vessel room and particulates are captured by the baghouse. The particulate matter collected by the baghouse is considered hazardous due to the contamination of nicotine in the particulates. The Volatile Organic Compounds (VOC) from the process are routed to the Facility's propane fired thermal oxidizer for destruction. The dry ingredients including nicotine salt, and some sugars are mixed before being sent to the wet mixing rooms where ethanol is added for flavoring. Once the mixture is combined, it is dried under vacuum heat provided by the temperature control unit (TCU). The final steps in the process involve the dried mixture which is sieved, and particulates are captured by the baghouse. The mixture (referred to as filler) is sent off site to an internal customer at a US Smokeless facility to be put into pouches to create the final product.

Additionally, the facility operates an emergency generator (installed in 2000) which is diesel fired. The Detroit Diesel generator is listed at 300kWe (480 hp) in the permit.

The opening conference concluded at 09:30 AM.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 09:35 AM by Maurice Chemweno, Jamie Schmidt, Derek Mueller, Lawerence Heyd, and Curtis Davis. Gabrielle Huerta and Amy Kasper of VADEQ also present for the walkthrough. EPA inspectors noted photos would be taken during the Facility walkthrough (Attachment 2). The facility noted that the DMW is classified as Class 1, Division 2. A LEL monitor was used to ensure safety as EPA had a non-intrinsically safe camera on-site.

The site walkthrough began with a walk behind the DMW to observe the facility's diesel fired emergency generator. EPA observed a non-resettable hour meter on the generator that read 764.2 hours. The facility stated the generator is seldom used and was installed in 2000 at the facility. It is maintained quarterly by Amentum. Next to the generator were two ethanol storage tanks.

EPA inspectors were then guided into the DMW to observe the mixing process. A monitor was obtained to maintain safety in the Class 1, Division 2 areas. All participants were also instructed to put on Tyvek gowns and hair coverings before entering the mixing area. The inspectors first entered the bulk dry ingredient room and dry mixing area, where sugars and nicotine salt are combined in mixing vessels. The vessels are connected via a duct on the ceiling that is connected to the cyclone and the baghouse. The cyclone creates a vacuum for any fugitive emissions and collects the PM in the baghouse. The Inspectors noted a sweet smell and a small amount of fogginess in the mixing area. The Facility representative stated that this was due to the sugar powders and nicotine powder being used.

EPA inspectors were then led into the wet mixing areas, where they observed mixing vessels for addition of ethanol, which the facility states are used in creating the flavoring for the filler. VOCs from this process are sent to the thermal oxidizer for destruction.

The filler created on site is then shipped to other Altria facilities for further processing and packaging into the nicotine pouches that are sold to the public. EPA then went outside of the DMW to observe the baghouse. The baghouse was operational. The reading on the magnehelic was 1 inch of water. EPA then observed the propane fired thermal oxidizer, which is used to destroy any VOCs from the process. The temperature readings on the thermal oxidizer were as follows. "A 1426F, B 1424F, Exit 1377 F". No Stack tesing has occurred for the thermal oxidizer. EPA inspectors then began their return to the conference room, observing a propane tank along the way, which is used to fuel the thermal oxidizer.

The walkthrough concluded at 10:10 AM.

IV. Records Review

EPA inspectors conducted a records review on site at 10:10 AM. It was requested that the facility send electronic copies as soon as possible. Maurice Chemweno said the records will all be sent to Kyle Krall within a week post inspection.

The request sent to the facility was as follows:

1. Provide a plot plan of the facility that clearly delineates each process unit and emission point listed in the Title V permit. *Provided*

2. Provide a detailed description of the process(es) which are conducted at the facility. This should include a description beginning from raw material delivery to final product shipping. *Provided*
3. Provide copies of annual emissions statements and reports submitted to VADEQ for the years 2020-2024. If not already included in the submittals to VADEQ, please include the emissions of each pollutant (PM, SO2, NOx, VOC) and hazardous air pollutant for each emission point. This submittal should also include the calculation or methodology used to calculate emissions and the emission factors used for each year. *Provided*
4. For each boiler, engine, furnace, or generator in place at the facility, provide the following information: *Provided*
    a. Make and model;
    b. Year constructed;
    c. Appropriate heat input or rating (MMBtu/hr, kW, HP, etc.);
    d. Fuels combusted (natural gas, fuel oil, diesel, etc.);
    e. Monthly hours of operation from January 2020 to the present;
    f. Monthly fuel use (gallons, MMscf, etc.) from January 2020 to the present;
    g. Copies of all visible emission monitoring records from January 2020 to the present;
    h. Maintenance records on any engines from January 2020-present
5. Any fuel delivery receipts and fuel certifications since January 2020. *Provided*

    a. Provide monthly emissions and rolling 12 month emissions of NOx, VOC, PM, and CO from January 2020 to the present. Include supporting calculations. *Provided*

6. Provide a list of any and each control device currently in use at Altria used to control or reduce emissions from any emission point at the site. The list should include: *Provided*
    a. The make/model of the control;
    b. Date of installation at the Facility;
    c. Which pollutant(s) are being controlled;
    d. Each source or emission point being controlled;
    e. The capture and destruction efficiency for each control;
7. Copies of any stack tests conducted on any engines or boilers to determine emission rate, control efficiency, or for compliance demonstrations, etc. conducted at the Facility since 2010. N/A
8. Provide copies of initial notifications, semiannual, and annual reports submitted to EPA or VADEQ for 40 C.F.R. Part 60 Subpart IIII and/or 40 C.F.R. Part63 Subpart ZZZZ. *Provided*
9. For the STLFP Process baghouse (BH0101ACL), provide the following records: *To be provided*
    a. Daily visible emission monitoring records for January 2020 to the present;
    b. Pressure drop monitoring records for January 2020 to the present.

V. Closing Conference

After the records review, EPA inspectors, Mr. Chemweno, Mr. Heyd, Mr. Mueller and Mr. Davis representing Altria along with VADEQ inspector Gabrielle Huerta and Amy Kasper had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. Mr. Chemweno would like the state and EPA to re-visit the NAICS codes the facility was assigned, as they do not process tobacco on site. The inspection concluded at 10:41 AM.

No potential issues were identified during the inspection.

VI. List of Attachments

Attachment 1:	Email correspondence to Maurice Chemweno of records requested to review during inspection
Attachment 2:	Photo Log
Attachment 3:	Sign in Sheet