



Industrial  
Products



August 5, 2015

Mr. William F. Durham, Director  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, West Virginia, 25304

**RE: Request for Class I Administrative Update  
ICL-IP America, Inc. Gallipolis Ferry Plant**

Dear Director Durham:

ICL-IP America, Inc. (ICL) is pleased to submit this written request for a Class I Administrative Update to the existing R13-2438 permit. The Gallipolis Ferry Plant operates under R30-05300007-2010 and currently has a Title V Renewal pending with the WVDEP, DAQ Title V permitting group.

ICL submits this Class I Administrative Update to remove Potential to Emit (PTE) emissions generated from the manufacturing of Fyrol CEF. Fyrol CEF had been historically produced within Production Unit I/IV, Group 2 Production. This product has not been manufactured since 2009 and has not been manufactured under the current Title V permit held by the facility.

WV 45 CSR 13 Section 10 states, *"A source which has not operated at least 500 hours in one 12-month period within the previous five (5)-year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits or general permit registrations may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown"*.

Based upon this citation from 45 CSR 13, Fyrol CEF can be considered permanently shut down since it has not been operated 500 hours in one 12-month period within the previous five year time period.

With this submittal, ICL requests that the PTE's associated with the manufacturing of Fyrol CEF be removed from the plant-wide PTEs. The removal of Fyrol CEF from ICL's permit results in a reduction of 6.17 tpy of HAPs from the overall PTE of the facility. The reduction of HAPs stemming from the removal of Fyrol CEF is displayed below in Table 1: Fyrol CEF Potentials to Emit.

RCVD BY WV DEP 04:05 PM AUG 06 15



**Table 1: Fyrol CEP Potentials to Emit**

Pollutant	PTE
Ethylene Oxide	2.49 tpy
Ethylene Dichloride	2.92 tpy
Formaldehyde	0.16 tpy
Acetaldehyde	0.60 tpy

No other updates are requested with the submittal of this Class I Administrative Update.

If you have any questions about the information submitted or if you would like to discuss this project, please do not hesitate to contact James Brent Turley, at (304) 674-6433.

Sincerely,

A handwritten signature in blue ink that reads 'John W. Kadlec'.

John Kadlec  
Director of Operations