



J.B. Turley
Environmental Engineer /
RC 14001 Mgmt. Rep.



September 9, 2015

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

RE: Reg. 13 Class II Administrative Update Application
Gallipolis Ferry Plant
ICL-IP America, Inc.

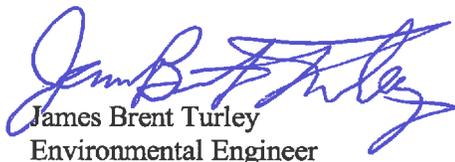
Dear Director Durham:

ICL-IP America, Inc. (ICL) is pleased to submit the enclosed application for a Reg. 13 Class II Administrative Update for the Gallipolis Ferry Plant near Gallipolis Ferry in Mason County, West Virginia. The original and two electronic copies (CD-ROM) of the complete application package are enclosed.

A legal advertisement will be published in the next few days and proof of publication will be forwarded as soon as it is received.

If you have any questions about the information submitted or if you would like to discuss this project, please do not hesitate to contact me at (304) 674-6433. The \$1,300 payment will be made via credit card.

Sincerely,


James Brent Turley
Environmental Engineer

cc: Grant Morgan, ERM – Grant.morgan@erm.com

Enclosures

ICL
11636 Huntington Road
Gallipolis Ferry, WV 25515
Tel. 304-675-1150 x 213
Cell. 304-674-6433
FAX. 304-675-6570
E-mail: james.turley@icl-group.com
www.icl-ip.com



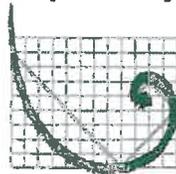
ICL-IP America, Inc.

Reg. 13 Class II Administrative Update Gallipolis Ferry Plant

Gallipolis Ferry, West Virginia

Title V Permit: R30-05300007-2015

Prepared By:



ERM

Environmental Resources Management, Inc.

Hurricane, West Virginia

September 2015

INTRODUCTION

ICL-IP America, Inc. (ICL) is submitting this Reg. 13 Class II Administrative Update to the WVDEP's Division of Air Quality for the Gallipolis Ferry Plant located in Mason County, West Virginia. This application addresses the operational changes at the facility associated with the replacement of a diesel emergency firewater pump.

FACILITY DESCRIPTION

The ICL Gallipolis Ferry facility operates in Mason County, WV. The facility will be replacing a 190 hp diesel emergency firewater pump with a 237 hp diesel emergency firewater pump.

With this application for a Class II Administrative Update, the applicant seeks the authority to remove the following equipment from their existing permit updates:

- One (1) diesel emergency firewater pump engine rated at 190 hp.

With this application for a Class II Administrative Update, the applicant seeks the authority to construct the following source:

- One (1) John Deere Clarke Model diesel emergency firewater pump engine rated at 237 hp.

A process flow diagram is included in this application in Attachment D.

REGULATORY DISCUSSION

This section outlines the State air quality regulations that could be reasonably expected to apply to the Gallipolis Ferry facility and makes an applicability determination for each regulation based on activities conducted at the site and the emissions of regulated air pollutants. This review is presented to supplement and/or add clarification to the information provided in the Reg. 13 Class II Administrative Update application forms.

The West Virginia State Regulations address applicable state (i.e. State Implementation Plan) rules as well as federal regulations, including Title I Prevention of Significant Deterioration Nonattainment New Source Review preconstruction permitting, Title V, New Source Performance Standards, and National Emission Standards for Hazardous Air Pollutants. The regulatory

requirements in reference to Gallipolis Ferry are described in detail in the below section.

WEST VIRGINIA STATE AIR REGULATIONS

45 CSR 02 – To Prevent and Control Particulate Air Pollution From Combustion of Fuel in Indirect Heat Exchangers

The diesel firewater engine is not considered an indirect heat exchanger and is therefore not subject to the opacity requirements of this rule.

45 CSR 04 – To Prevent and Control the Discharge of Air Pollutants into the Air Which Causes or Contributes to an Objectionable Odor

Operations conducted at the Gallipolis Ferry facility are subject to this requirement. Based on the nature of the process at the wellpad, the presence of objectionable odors is unlikely.

45 CSR 06 – Control of Air Pollution from the Combustion of Refuse

There is no combustion of refuse at the Gallipolis Ferry facility. Therefore the facility is not subject to the conditions of this regulatory requirement.

45 CSR 10 – To Prevent and Control Air Pollution From the Emission of Sulfur Oxides

Sulfur oxide emissions from the emergency firewater pump diesel engine are subject to the facility's 2,000 ppm_v sulfur dioxide concentration limitation but are exempt from most other requirements in the rule aside from discretionary testing requirements. Compliance with the allowable sulfur dioxide concentration limitations is based on a block (3) hour averaging time.

45 CSR 13 – Permits for Construction, Modification, Relocation, And Operation of Stationary Sources of Air Pollutants

This Reg. 13 Class II Administrative Update is being submitted for the operational activities associated with the emergency engine to be installed at this site.

45 CSR 14 / 45 CSR 19 – Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration / Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contributed to Non-attainment

The Gallipolis Ferry Plant is a major stationary source, and the current changes proposed in this permit application do not change this facility's status. Additionally, the plant is located in Mason County which is an EPA attainment

area. Under both of these conditions, the ICL Gallipolis Ferry Plant is not subject to the conditions of 45 CSR 19 and 45 CSR 14.

45 CSR 16 - Standards of Performance for New Stationary Sources (NSPS)

45CSR 16 applies to all registrants with affected facilities that are subject to any of the NSPS requirements, described in more detail in the Federal Regulations section.

45 CSR 30 – Requirements for Operating Permits

45 CSR 30 applies to the requirements of the federal Title V operating permit program (40 CFR 70). The major source thresholds with respect to the West Virginia Title V operating permit program regulations are 10 tons per year (tpy) of a single HAP, 25 tpy of any combination of HAPs, and 100 tpy of all other regulated pollutants.

The actions listed in this Reg. 13 Class II Administrative Update do not qualify as a major modification. With this submission, ICL seeks the authority to construct the new source and to modify the existing Title V Permit.

45 CSR 34 – National Emission Standards for Hazardous Air Pollutants (NESHAP)

45 CSR 34 applies to all registrants that are subject to any of the NESHAP requirements, described in more detail in the Federal Regulations section.

FEDERAL REGULATIONS

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

Subpart IIII established standards and compliance schedules for the control of Particulate Matter (PM), Nitrogen Oxides (NO_x), and Carbon Monoxide (CO) emissions from affected facilities that commence construction, modification, or reconstruction after July 11, 2005.

The Clarke JU6H-UFAD88 diesel-fired compression engine included with this Class II Administrative Update is subject to the requirements of this Rule. The generator is a compression ignition internal combustion engine that commenced construction in 2015 and was manufactured in 2015. This engine is subject to an emission limit of 4.0 g/KW-hr for HC+NO_x. This engine has received EPA Certification with regards to Subpart IIII, which is included in this permit application. This engine is subject to emission limits of 2.6 g/hp-hr CO, and 0.15 g/hp-hr PM.

40 CFR 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines)

This permit update involves the operation of a diesel powered 237 hp reciprocating internal combustion engine. This engine was manufactured after July 1, 2008 and therefore will comply with 40 CFR 63 Subpart ZZZZ by complying with 40 CFR 60 Subpart IIII.



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY

601 57th Street, SE
 Charleston, WV 25304
 (304) 926-0475
www.dep.wv.gov/daq

**APPLICATION FOR NSR PERMIT
 AND
 TITLE V PERMIT REVISION
 (OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO **NSR (45CSR13)** (IF KNOWN):
 CONSTRUCTION MODIFICATION RELOCATION
 CLASS I ADMINISTRATIVE UPDATE TEMPORARY
 CLASS II ADMINISTRATIVE UPDATE AFTER-THE-FACT

PLEASE CHECK TYPE OF **45CSR30 (TITLE V)** REVISION (IF ANY):
 ADMINISTRATIVE AMENDMENT MINOR MODIFICATION
 SIGNIFICANT MODIFICATION
 IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS **ATTACHMENT S** TO THIS APPLICATION

FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

Section I. General

1. Name of applicant (as registered with the WV Secretary of State's Office): Israel Chemicals Ltd		2. Federal Employer ID No. (FEIN): 731708310	
3. Name of facility (if different from above): Gallipolis Ferry Plant		4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH	
5A. Applicant's mailing address: PO Box 1721 Gallipolis Ferry, WV 25537		5B. Facility's present physical address: State Route 2 Gallipolis Ferry, WV 25537	
6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO - If YES, provide a copy of the Certificate of Incorporation/Organization/Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A . - If NO, provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change amendments or other Business Certificate as Attachment A .			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation:			
8. Does the applicant own, lease, have an option to buy or otherwise have control of the <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO - If YES, please explain: - If NO, you are not eligible for a permit for this source.			
9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): Chemical Manufacturing		10. North American Industry Classification System (NAICS) code for the facility: 2869	
11A. DAQ Plant ID No. (for existing facilities only): 053 - 00007		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R13-2438P and R30-0530007-2015	

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.



<p>12A.</p> <ul style="list-style-type: none"> For Modifications, Administrative Updates or Temporary permits at an existing facility, please provide directions to the <i>present location</i> of the facility from the nearest state road; For Construction or Relocation permits, please provide directions to the <i>proposed new site location</i> from the nearest state road. Include a MAP as Attachment B. <p>Adjacent to State Route 2 in Gallipolis Ferry WV.</p>		
12.B. New site address (if applicable): NA	12C. Nearest city or town: Gallipolis Ferry, WV	12D. County: Mason
12.E. UTM Northing (KM): 4292.3	12F. UTM Easting (KM): 395.6	12G. UTM Zone: 17S
13. Briefly describe the proposed change(s) at the facility: Replacement of emergency diesel generator.		
14A. Provide the date of anticipated installation or change: / /		14B. Date of anticipated Start-Up if a permit is granted: / /
<ul style="list-style-type: none"> If this is an After-The-Fact permit application, provide the date upon which the proposed change did happen: / / 		
14C. Provide a Schedule of the planned Installation of/Change to and Start-Up of each of the units proposed in this permit application as Attachment C (if more than one unit is involved).		
15. Provide maximum projected Operating Schedule of activity/activities outlined in this application: Hours Per Day 24 Days Per Week 7 Weeks Per Year 52		
16. Is demolition or physical renovation at an existing facility involved? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
17. Risk Management Plans. If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your Risk Management Plan (RMP) to U. S. EPA Region III.		
18. Regulatory Discussion. List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (<i>if known</i>). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (<i>if known</i>). Provide this information as Attachment D .		
Section II. Additional attachments and supporting documents.		
19. Include a check payable to WVDEP – Division of Air Quality with the appropriate application fee (per 45CSR22 and 45CSR13).		
20. Include a Table of Contents as the first page of your application package.		
21. Provide a Plot Plan , e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as Attachment E (Refer to Plot Plan Guidance).		
<ul style="list-style-type: none"> Indicate the location of the nearest occupied structure (e.g. church, school, business, residence). 		
22. Provide a Detailed Process Flow Diagram(s) showing each proposed or modified emissions unit, emission point and control device as Attachment F .		
23. Provide a Process Description as Attachment G .		
<ul style="list-style-type: none"> Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable). 		
All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.		

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.
 – For chemical processes, provide a MSDS for each compound emitted to the air.

25. Fill out the **Emission Units Table** and provide it as **Attachment I**.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

<input type="checkbox"/> Bulk Liquid Transfer Operations	<input type="checkbox"/> Haul Road Emissions	<input type="checkbox"/> Quarry
<input type="checkbox"/> Chemical Processes	<input type="checkbox"/> Hot Mix Asphalt Plant	<input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities
<input type="checkbox"/> Concrete Batch Plant	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Storage Tanks
<input type="checkbox"/> Grey Iron and Steel Foundry	<input checked="" type="checkbox"/> Indirect Heat Exchanger	
<input type="checkbox"/> General Emission Unit, specify: Diesel Engines		

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

<input type="checkbox"/> Absorption Systems	<input type="checkbox"/> Baghouse	<input type="checkbox"/> Flare
<input type="checkbox"/> Adsorption Systems	<input type="checkbox"/> Condenser	<input type="checkbox"/> Mechanical Collector
<input type="checkbox"/> Afterburner	<input type="checkbox"/> Electrostatic Precipitator	<input type="checkbox"/> Wet Collecting System
<input type="checkbox"/> Other Collectors, specify		

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**.

➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

YES NO

➤ If **YES**, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "**Precautionary Notice – Claims of Confidentiality**" guidance found in the **General Instructions** as **Attachment Q**.

Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

<input type="checkbox"/> Authority of Corporation or Other Business Entity	<input type="checkbox"/> Authority of Partnership
<input type="checkbox"/> Authority of Governmental Agency	<input type="checkbox"/> Authority of Limited Partnership

Submit completed and signed **Authority Form** as **Attachment R**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

Certification of Truth, Accuracy, and Completeness

I, the undersigned **Responsible Official** / **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE John W. Kadlec DATE: 9/8/15
(Please use blue ink) (Please use blue ink)

35B. Printed name of signee: John W. Kadlec		35C. Title: Director of Operations
35D. E-mail: NA	36E. Phone: (304) 675-1150	36F. FAX: (304) 675-6570
36A. Printed name of contact person (if different from above): James Turley		36B. Title: Environmental Engineer
36C. E-mail: james.turley@icl-group.com	36D. Phone: (304) 657-1150	36E. FAX: (304) 675-6570

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

<input checked="" type="checkbox"/> Attachment A: Business Certificate	<input checked="" type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet
<input checked="" type="checkbox"/> Attachment B: Map(s)	<input checked="" type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s)
<input checked="" type="checkbox"/> Attachment C: Installation and Start Up Schedule	<input checked="" type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s)
<input checked="" type="checkbox"/> Attachment D: Regulatory Discussion	<input checked="" type="checkbox"/> Attachment N: Supporting Emissions Calculations
<input checked="" type="checkbox"/> Attachment E: Plot Plan	<input checked="" type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans
<input checked="" type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s)	<input checked="" type="checkbox"/> Attachment P: Public Notice
<input checked="" type="checkbox"/> Attachment G: Process Description	<input checked="" type="checkbox"/> Attachment Q: Business Confidential Claims
<input checked="" type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS)	<input checked="" type="checkbox"/> Attachment R: Authority Forms
<input checked="" type="checkbox"/> Attachment I: Emission Units Table	<input checked="" type="checkbox"/> Attachment S: Title V Permit Revision Information
<input checked="" type="checkbox"/> Attachment J: Emission Points Data Summary Sheet	<input checked="" type="checkbox"/> Application Fee

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:

Forward 1 copy of the application to the Title V Permitting Group and:

For Title V Administrative Amendments:

NSR permit writer should notify Title V permit writer of draft permit,

For Title V Minor Modifications:

Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,

NSR permit writer should notify Title V permit writer of draft permit.

For Title V Significant Modifications processed in parallel with NSR Permit revision:

NSR permit writer should notify a Title V permit writer of draft permit,

Public notice should reference both 45CSR13 and Title V permits,

EPA has 45 day review period of a draft permit.



All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or request by phone.

A	Current Business Certificate
B	Site Location Map
C	Schedule of Changes
D	Regulatory Discussion
E	Plot Plan
F	Detailed Process Flow Diagrams
G	Process Descriptions
H	Material Safety Data Sheets (MSDS)
I	Equipment List Form
J	Emission Points Data Summary Sheets
K	Fugitive Emissions Data Summary Sheets
L	Emissions Unit Data Sheets
M	Air Pollution Control Device Sheets
N	Supporting Emissions Calculations
O	Monitoring/Recordkeeping/Reporting/Testing Plans
P	Public Notice
Q	Business Confidential Claims
R	Authority Forms
S	Title V Permit Revision Information
T	
U	
V	
W	
X	
Y	
Z	

**WEST VIRGINIA
STATE TAX DEPARTMENT
BUSINESS REGISTRATION
CERTIFICATE**

ISSUED TO:
ICL-IP AMERICA INC
PO BOX 2
GALLIPOLIS FERRY, WV 25515-0002

BUSINESS REGISTRATION ACCOUNT NUMBER: 2193-9173

This certificate is issued on: 08/21/2014

*This certificate is issued by
the West Virginia State Tax Commissioner
in accordance with Chapter 11, Article 12, of the West Virginia Code*

*The person or organization identified on this certificate is registered
to conduct business in the State of West Virginia at the location above.*

This certificate is not transferrable and must be displayed at the location for which issued.

This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia.



STATE OF WEST VIRGINIA
State Tax Department, Revenue Division
P. O. Box 2666
Charleston, WV 25330-2666



Earl Ray Tomblin, Governor

Mark W. Matkovich, Tax Commissioner

ICL-IP AMERICA INC
622 EMERSON RD STE 500
SAINT LOUIS MO 63141-6708

Letter Id: L1439406656
Issued: 08/21/2014
Account #: 2193-9173

00012402010000



RE: Business Registration Certificate

The West Virginia State Tax Department would like to thank you for registering your business. Enclosed is your Business Registration Certificate. This certificate shall be permanent until cessation of business or until suspended, revoked or cancelled. Changes in name, ownership or location are considered a cessation of business; a new Business Registration Certificate and applicable fees are required. Please review the certificate for accuracy.

This certificate must be prominently displayed at the location for which issued. Engaging in business without conspicuously posting a West Virginia Business Registration Certificate in the place of business is a crime and may subject you to fines per W.Va. Code § 11-9.

When contacting the State Tax Department, refer to the appropriate account number listed on the back of this page. The taxes listed may not be all the taxes for which you are responsible. Account numbers for taxes are printed on the tax returns mailed by the State Tax Department. Failure to timely file tax returns may result in penalties for late filing.

Should the nature of your business activity or business ownership change, your liability for these and other taxes will change accordingly.

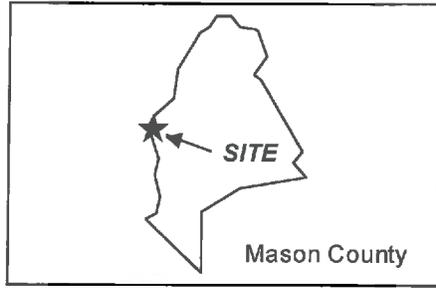
To learn more about these taxes and the services offered by the West Virginia State Tax Department, visit our web site at www.wvtax.gov.

Enclosure

atL006 v.4



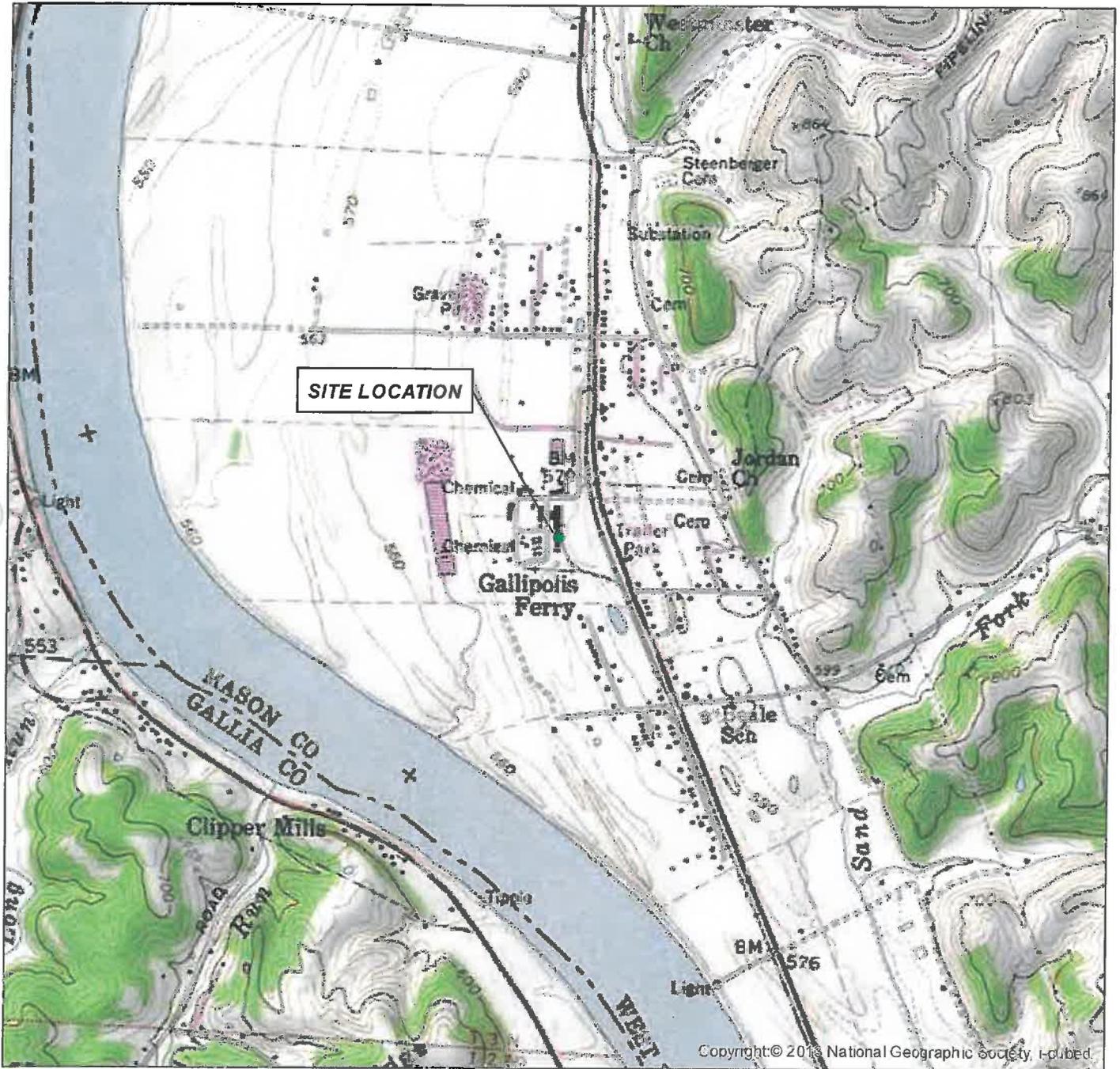
West Virginia



Mason County



LAT. 38.772 LON. -82.201
MASON COUNTY
WEST VIRGINIA



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USGS 1:24K 7.5' Quadrangle:
Gallipolis, WV

SITE LOCATION MAP

Gallipolis Ferry Facility

ICL-IP America, Inc.
Mason County, West Virginia

GIS Review: GM

CHK'D: GM

0307688



Drawn By:
SRV-8/25/15

Environmental Resources Management

ATTACHMENT B

Attachment C

Schedule of Installation

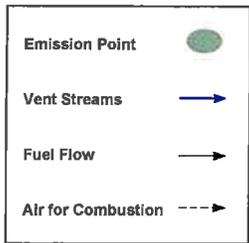
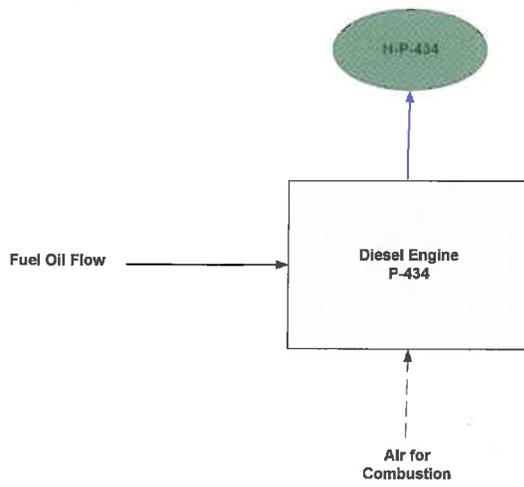
Equipment included in this permit application will be installed upon issuance of this permit.

Attachment D

Regulatory Discussion

A state and federal regulatory discussion is included with the introduction to this permit application.

Attachment F – Process Flow Diagram



Attachment G – Process Description

A new 2015, 237 horsepower diesel emergency engine is replacing a 1976, 190 horsepower diesel engine. The new engine is serving the same role as a fire-pump engine to the facility.

Attachment H – Material Safety Data Sheets

This update replaces an existing firewater pump with a new firewater pump and does not introduce any chemicals to the site. For this reason, an SDS is not included with this submission.

**Attachment J
EMISSION POINTS DATA SUMMARY SHEET**

Table 1: Emissions Data

Emission Point ID No. (Must match Emission Units Table & Plot Plan)	Emission Point Type ¹	Emission Unit Vented Through This Point (Must match Emission Units Table & Plot Plan)		Air Pollution Control Device (Must match Emission Units Table & Plot Plan)		Vent Time for Emission Unit (chemical processes only)		All Regulated Pollutants - Chemical Name/CAS ³ (Speciate VOCs & HAPs)	Maximum Potential Uncontrolled Emissions ⁴		Maximum Potential Controlled Emissions ⁵		Emission Form or Phase (At exit conditions, Solid, Liquid or Gas/Vapor)	Est. Method Used ⁶	Emission Concentration ⁷ (ppmv or mg/m ⁴)
		ID No.	Source	ID No.	Device Type	Short Term ²	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
H-P-434	Upward Vertical Stack	P-434	Diesel Engine	NA	NA	C	500	Total VOCs	0.05	0.01	0.05	0.01	Gas	AP-42, Subpart C, EPA Certified Engine Date	N/A
								NO _x	1.48	0.37	1.48	0.37			
								CO	0.47	0.12	0.47	0.12			
								PM ₁₀	0.05	0.01	0.05	0.01			
								PM _{2.5}	0.05	0.01	0.05	0.01			
								SO _x	0.39	0.10	0.39	0.10			
								Total HAPs	0.01	0.03	0.01	0.03			
								CO ₂	271.79	67.95	271.79	67.95			
CO _{2e}	271.79	67.95	271.79	67.95											

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

- ¹ Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.
- ² Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).
- ³ List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS₂, VOCs, H₂S, Inorganics, Lead, Organics, O₃, NO, NO₂, SO₂, SO₃, all applicable Greenhouse Gases (including CO₂ and methane), etc. DO NOT LIST H₂, H₂O, N₂, O₂, and Noble Gases.
- ⁴ Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- ⁵ Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- ⁶ Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).
- ⁷ Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m³) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO₂, use units of ppmv (See 45CSR10).

Attachment K

Fugitive Emissions Data Summary

Fugitive Emissions will be unaffected in this Reg. 13 Class II Administration Update.

**Attachment L
EMISSIONS UNIT DATA SHEET
GENERAL**

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on *Equipment List Form*): **P-434**

<p>1. Name or type and model of proposed affected source:</p> <p>237 hp Diesel Engine</p>
<p>2. On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.</p>
<p>3. Name(s) and maximum amount of proposed process material(s) charged per hour:</p> <p>NA</p>
<p>4. Name(s) and maximum amount of proposed material(s) produced per hour:</p> <p>NA</p>
<p>5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:</p> <p>NA</p>

* The identification number which appears here must correspond to the air pollution control device identification number appearing on the *List Form*.

6. Combustion Data (if applicable):

(a) Type and amount in appropriate units of fuel(s) to be burned:

NA

(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:

Diesel fuel

(c) Theoretical combustion air requirement (ACF/unit of fuel):

NA @ NA °F and NA psia.

(d) Percent excess air: NA

(e) Type and BTU/hr of burners and all other firing equipment planned to be used:

NA

(f) If coal is proposed as a source of fuel, identify supplier and seams and give sizing of the coal as it will be fired:

NA

(g) Proposed maximum design heat input: NA × 10⁶ BTU/hr.

7. Projected operating schedule: 500 hrs/year

Hours/Day	NA	Days/Week	NA	Weeks/Year	NA
-----------	----	-----------	----	------------	----

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:				
@	NA	°F and	Ambient	psia
a. NO _x		1.48 lb/hr	NA	grains/ACF
b. SO ₂		0.39 lb/hr	NA	grains/ACF
c. CO		0.47 lb/hr	NA	grains/ACF
d. PM ₁₀		0.05 lb/hr	NA	grains/ACF
e. Hydrocarbons		0.05 lb/hr	NA	grains/ACF
f. VOCs		0.05 lb/hr	NA	grains/ACF
g. Pb		NA lb/hr	NA	grains/ACF
h. Specify other(s)				
Total HAPs		0.01 lb/hr	NA	grains/ACF
Total CO _{2e}		271.79 lb/hr	NA	grains/ACF
		lb/hr		grains/ACF
		lb/hr		grains/ACF

NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.

(2) Complete the Emission Points Data Sheet.

9. Proposed Monitoring, Recordkeeping, Reporting, and Testing
Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING
See Attachment O.

RECORDKEEPING
See Attachment O.

REPORTING
See Attachment O.

TESTING
See Attachment O.

MONITORING. PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

RECORDKEEPING. PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

REPORTING. PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

TESTING. PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

NA

Attachment M
Air Pollution Control Device Sheets

No air pollution control devices are proposed for the diesel firewater pump in this Reg. 13 Class II Administration Update.

$$\frac{19,300 \text{ Btu}}{\text{lb}} \cdot \frac{7.1 \text{ lb}}{\text{gal}} \cdot \frac{12 \text{ gal}}{\text{hr}} = \frac{1.644 \text{ MM Btu}}{\text{hr}}$$

AP-42

Table 3.3-1; Diesel Fuel

Diesel Engine Emissions

$$\frac{.2916}{\text{MM Btu}} \times \frac{1.644 \text{ MM Btu}}{\text{hr}} = 0.48 \frac{\text{lb}}{\text{hr}}$$

$$= \frac{0.12 \text{ ton}}{\text{yr}} \quad \left(\frac{500 \text{ hrs}}{\text{yr}} \right)$$

Emission Factors:

Parameter	Unit	Value
CO	lb/MM Btu	0.0009
HC	lb/MM Btu	0.0001
NOx	lb/MM Btu	0.0001
PM	lb/MM Btu	0.0001

Assumptions (AP-42):
 BSFC (Btu/hr) 7000
 Diesel Density (lb/gal) 7.1
 Diesel Heating Value (Btu/lb) 19300
 Diesel Carbon Content (%) 87%

Parameter	Unit	Value
NO	lb/MM Btu	0.0001
HC	lb/MM Btu	0.0001
PM	lb/MM Btu	0.0001
CO	lb/MM Btu	0.0009

Emission Rates:

Parameter	Unit	Value
CO	lb/hr	0.0009
HC	lb/hr	0.0001
NOx	lb/hr	0.0001
PM	lb/hr	0.0001

Hazardous Air Pollutant PTEs:

Parameter	Unit	Value
Benzene	lb/hr	<0.01
Toluene	lb/hr	<0.01
Xylenes	lb/hr	<0.01
Propylene	lb/hr	<0.01
1,3-Butadiene	lb/hr	<0.01
Formaldehyde	lb/hr	<0.01
Acetaldehyde	lb/hr	<0.01
Naphthalene	lb/hr	<0.01
Acenaphthylene	lb/hr	<0.01
Acenaphthene	lb/hr	<0.01
Fluorene	lb/hr	<0.01
Phenanthrene	lb/hr	<0.01
Anthracene	lb/hr	<0.01
Fluoranthene	lb/hr	<0.01
Pyrene	lb/hr	<0.01
Benzo[a]anthracene	lb/hr	<0.01
Chrysene	lb/hr	<0.01
Benzo[b]fluoranthene	lb/hr	<0.01
Benzo[k]fluoranthene	lb/hr	<0.01
Benzo[e]pyrene	lb/hr	<0.01
Indeno[1,2,3-cd]pyrene	lb/hr	<0.01
Dibenz[a,h]anthracene	lb/hr	<0.01
Benzo[ghi]perylene	lb/hr	<0.01
Total HAPs	lb/hr	<0.01

- 1. Local Assumptions are from AP-42, Chapter 3.3 (revised October 1998)
- 2. Emission Factors for NOx, PM10, and CO emissions were obtained from the Engine's EPA Certification 80084FC28A
- 3. Emission Factor for VOCs were based upon AP-42, Chapter 2.1 (revised October 1998)
- 4. Assumes Maximum Operation of 500 hours per Year in line with Permit Requirements
- 5. PM10 = Total PM
- 6. CO2 Emissions Calculated using Equation C-4 in 40 CFR 98 Subpart C designated for Tier III Engines with Liquid Fuel
- 7. CH4 and N2O Emissions Calculated using Equation C-8 in 40 CFR 98 Subpart C
- 8. Carbon Content Estimated using AP-42 Assumptions for Diesel Fuel
- 9. Hazardous Air Pollutant Rates based upon AP-42, Chapter 3.7 (revised October 1998)

$$\frac{.006 \text{ lb}}{\text{MM Btu}} \cdot \frac{1.644 \text{ MM Btu}}{\text{hr}} = 0.00986 \frac{\text{lb}}{\text{hr}}$$

ICL Emission Rates - Initial Permit Levels:

Emission ID	Emission Point ID	Maximum Rating (t/d)	NOx		CO		SOx		PM10		PM2.5		VOC		OC		GHG		Total Emissions		
			(t/d)	(t/yr)	(t/d)	(t/yr)	(t/d)														
P-434	HP-434	180	4.34	1.08	0.84	0.23	0.28	0.07	0.31	0.38	0.31	0.38	0.35	0.38	0	0	0	0	0	0	0

ICL Modified Emission Rates:

Emission ID	Emission Point ID	Maximum Rating (t/d)	NOx		CO		SOx		PM10		PM2.5		VOC		OC		GHG		Total Emissions				
			(t/d)	(t/yr)	(t/d)	(t/yr)	(t/d)	(t/yr)															
P-434	HP-434	237	1.48	0.37	0.4	0.12	0.28	0.16	0.08	0.01	0.05	0.01	0.05	0.05	0.01	271.76	67.95	<0.001	<0.001	<0.001	<0.001	271.76	67.95

Non-Combustible Pollutant Breakdown

Emission ID	Emission Point ID	Maximum Rating (t/d)	NOx		CO		SOx		PM10		PM2.5		VOC		OC		GHG		Total Emissions				
			(t/d)	(t/yr)	(t/d)	(t/yr)	(t/d)	(t/yr)															
P-434	HP-434	237	1.48	0.37	0.4	0.12	0.28	0.16	0.08	0.01	0.05	0.01	0.05	0.05	0.01	271.76	67.95	<0.001	<0.001	<0.001	<0.001	271.76	67.95

Total Change in Emission Rates:

Emission ID	Emission Point ID	Maximum Rating (t/d)	NOx		CO		SOx		PM10		PM2.5		VOC		OC		GHG		Total Emissions			
			(t/d)	(t/yr)	(t/d)	(t/yr)	(t/d)	(t/yr)	(t/d)	(t/yr)	(t/d)	(t/yr)										
P-434	HP-434	237	-2.86	-0.72	-2.47	-0.11	0.100	0.08	-0.28	-0.07	-0.28	-0.07	-0.30	-0.08	271.76	67.95	<0.001	<0.001	<0.001	<0.001	271.76	67.95

Non-Combustible Pollutant Breakdown

Emission ID	Emission Point ID	Maximum Rating (t/d)	NOx		CO		SOx		PM10		PM2.5		VOC		OC		GHG		Total Emissions				
			(t/d)	(t/yr)	(t/d)	(t/yr)	(t/d)	(t/yr)															
P-434	HP-434	237	1.48	0.37	0.4	0.12	0.28	0.16	0.08	0.01	0.05	0.01	0.05	0.05	0.01	271.76	67.95	<0.001	<0.001	<0.001	<0.001	271.76	67.95

Attachment N – Emission Calculations

Emission Calculation Explanation

Emissions were calculated using a combination of EPA Certified Engine Data, AP-42 Chapter 3.3 Emission Factors, and 40 CFR 98 Subpart C Greenhouse Gas Calculation Methods. Nitrogen oxides, Carbon monoxide, Particulate Matter and Volatile Organic Compounds calculations were developed using EPA Certified Emissions Data (Rating 6068HFC28A) for the John-Deere Clarke Model Engine JU6H-UFAD88. It was conservatively assumed that the Hydrocarbon value was 100% comprised of volatile organic compounds. Sulfur oxides emissions were calculated using AP-42 emission factors. The remaining greenhouse gas emissions were calculated using 40 CFR Subpart C emissions equations for Tier 3 Engines. It is worth noting that calculation assumptions including the brake-specific fuel combustion, diesel fuel density, diesel fuel heating values, and diesel fuel carbon content, utilized for both AP-42 and Subpart C emission calculations were retrieved from AP-42 Chapter 3.3.

Rating Specific Emissions Data - John Deere Power Systems



Nameplate Rating Information

Clarke Model	JU6H-UFAD88
Power Rating (BHP / kW)	237 / 177
Certified Speed (RPM)	1760

Rating Data

Rating	6068HFC28A	
Certified Power (kW)	177	
Rated Speed	1760	
Vehicle Model Number	Clarke Fire Pump	
Units	g/kW-hr	g/hp-hr
NOx	3.62	2.70
HC	0.16	0.12
NOx + HC	N/A	N/A
Pm	0.13	0.10
CO	1.2	0.9

Certificate Data

Engine Model Year	2015
EPA Family Name	FJDXL06.8120
EPA JD Name	350HAK
EPA Certificate Number	FJDXL06.8120-004
CARB Executive Order	Not Applicable
Parent of Family	6068HFG82A
Units	g/kW-hr
NOx	3.79
HC	0.12
NOx + HC	N/A
Pm	0.12
CO	1.2

* The emission data listed is measured from a laboratory test engine according to the test procedures of 40 CFR 89 or 40 CFR 1039, as applicable. The test engine is intended to represent nominal production hardware, and we do not guarantee that every production engine will have identical test results. The family parent data represents multiple ratings and this data may have been collected at a different engine speed and load. Emission results may vary due to engine manufacturing tolerances, engine operating conditions, fuels used, or other conditions beyond our control.

This information is property of Deere & Company. It is provided solely for the purpose of obtaining certification or permits of Deere powered equipment. Unauthorized distribution of this information is prohibited.

INSTALLATION & OPERATION DATA (I&O Data)

USA Produced

Basic Engine Description

Engine Manufacturer	John Deere Co.
Ignition Type	Compression (Diesel)
Number of Cylinders	6
Bore and Stroke - in (mm)	4.19 (106) X 5 (127)
Displacement - in ³ (L)	415 (6.8)
Compression Ratio	19.0:1
Valves per cylinder	
Intake	1
Exhaust	1
Combustion System	Direct Injection
Engine Type	In-Line, 4 Stroke Cycle
Fuel Management Control	Electronic, High Pressure Common Rail
Firing Order (CW Rotation)	1-5-3-6-2-4
Aspiration	Turbocharged
Charge Air Cooling Type	Raw Water
Rotation, viewed from front of engine, Clockwise (CW)	Standard
Engine Crankcase Vent System	Open
Installation Drawing	D628
Weight - lb (kg)	1747 (792)

Power Rating

	1760
Nameplate Power - HP (kW)	237 (177)

Cooling System - [C051386]

	1760
Engine Coolant Heat - Btu/sec (kW)	80 (84.4)
Engine Radiated Heat - Btu/sec (kW)	54 (57)
Heat Exchanger Minimum Flow	
60°F (15°C) Raw H ₂ O - gal/min (L/min)	13 (49.2)
100°F (37°C) Raw H ₂ O - gal/min (L/min)	20 (75.7)
Heat Exchanger Maximum Cooling Raw Water	
Inlet Pressure - psi (bar)	60 (4.1)
Flow - gal/min (L/min)	40 (151)
Typical Engine H ₂ O Operating Temp - °F (°C) ¹	180 (82.2) - 195 (90.6)
Thermostat	
Start to Open - °F (°C)	180 (82.2)
Fully Opened - °F (°C)	203 (95)
Engine Coolant Capacity - qt (L)	20.5 (19.4)
Coolant Pressure Cap - lb/in ² (kPa)	15 (103)
Maximum Engine Coolant Temperature - °F (°C)	230 (110)
Minimum Engine Coolant Temperature - °F (°C)	160 (71.1)
High Coolant Temp Alarm Switch - °F (°C) ²	235 (113) - 241 (116)

Electric System - DC

	<u>Standard</u>		<u>Optional</u>	
System Voltage (Nominal)	12		24	
Battery Capacity for Ambients Above 32°F (0°C)				
Voltage (Nominal)	12	[C07633]	24	[C07633]
Qty. Per Battery Bank	1		2	
SAE size per J537	8D		8D	
CCA @ 0°F (-18°C)	1400		1400	
Reserve Capacity - Minutes	430		430	
Battery Cable Circuit, Max Resistance - ohm	0.0012		0.0012	
Battery Cable Minimum Size				
0-120 in. Circuit Length ³	00		00	
121-160 in. Circuit Length ³	000		000	
161-200 in. Circuit Length ³	0000		0000	
Charging Alternator Maximum Output - Amp.	40	[C071363]	55	[C071365]
Starter Cranking Amps, Rolling - @60°F (15°C)	440	[RE69704/RE70404]	250	[C07819/C07820]

NOTE: This engine is intended for indoor installation or in a weatherproof enclosure. ¹Engine H₂O temperature is dependent on raw water temperature and flow. ²High Coolant Switch threshold varies with engine load. ³Positive and Negative Cables Combined Length.

INSTALLATION & OPERATION DATA (I&O Data)

USA Produced

Exhaust System

1760

Exhaust Flow - ft. ³ /min (m ³ /min) -----	1189 (33.7)
Exhaust Temperature - °F (°C) -----	986 (530)
Maximum Allowable Back Pressure - in H ₂ O (kPa) -----	30 (7.5)
Minimum Exhaust Pipe Dia. - in (mm) ^[4] -----	5 (127)

Fuel System

1760

Fuel Consumption - gal/hr (L/hr) -----	12 (45.4)
Fuel Return - gal/hr (L/hr) -----	16.6 (62.8)
Fuel Supply - gal/hr (L/hr) -----	28.6 (108)
Fuel Pressure - lb/in ² (kPa) -----	3 (20.7) - 6 (41.4)
Minimum Line Size - Supply - in. -----	.50 Schedule 40 Steel Pipe
Pipe Outer Diameter - in (mm) -----	0.848 (21.5)
Minimum Line Size - Return - in. -----	.375 Schedule 40 Steel Pipe
Pipe Outer Diameter - in (mm) -----	0.675 (17.1)
Maximum Allowable Fuel Pump Suction Lift with clean Filter - in H ₂ O (mH ₂ O) -----	80 (2)
Maximum Allowable Fuel Head above Fuel pump, Supply or Return - ft (m) -----	6.6 (2)
Fuel Filter Micron Size -----	2 (Secondary)

Heater System

Standard

Optional

Engine Coolant Heater		
Wattage (Nominal) -----	1360	1360
Voltage - AC, 1 Phase -----	115 (+5% -10%)	230 (+5%, -10%)
Part Number -----	[C123640]	[C123644]

Air System

1760

Combustion Air Flow - ft. ³ /min (m ³ /min) -----	457 (12.9)	
Air Cleaner	Standard	Optional
Part Number -----	[C03396]	[C03327]
Type -----	Indoor Service Only, with Shield	Canister, Single-Stage
Cleaning method -----	Washable	Disposable
Air Intake Restriction Maximum Limit		
Dirty Air Cleaner - in H ₂ O (kPa) -----	10 (2.5)	10 (2.5)
Clean Air Cleaner - in H ₂ O (kPa) -----	6 (1.5)	5 (1.2)
Maximum Allowable Temperature (Air To Engine Inlet) - °F (°C) ^[5] -----	130 (54.4)	

Lubrication System

Oil Pressure - normal - lb/in ² (kPa) -----	40 (276) - 60 (414)
Low Oil Pressure Alarm Switch - lb/in ² (kPa) ^[6] -----	30 (207) to 35 (241)
In Pan Oil Temperature - °F (°C) -----	220 (104) - 245 (118)
Total Oil Capacity with Filter - qt (L) -----	21.1 (20)

Lube Oil Heater

Optional

Optional

Wattage (Nominal) -----	150	150
Voltage -----	120V (+5%, -10%)	240V (+5%, -10%)
Part Number -----	C04430	C04431

Performance

1760

BMEP - lb/in ² (kPa) -----	257 (1770)
Piston Speed - ft/min (m/min) -----	1467 (447)
Mechanical Noise - dB(A) @ 1m -----	C133373
Power Curve -----	C132682

⁴Based on Nominal System. Back pressure flow analysis must be done to assure maximum allowable back pressure is not exceeded. (Note: minimum exhaust Pipe diameter is based on: 15 feet of pipe, one 90° elbow, and a silencer pressure drop no greater than one half of the maximum allowable back pressure.) ⁵Review for horsepower derate if ambient air entering engine exceeds 77°F (25°C). ⁶Low Oil Pressure Switch threshold varies w/engine speed. [] indicates component reference part number.

Attachment O

Monitoring, Reporting, and Recordkeeping Plan

The monitoring, recordkeeping, reporting, and testing requirements for this facility remain unaffected by this Reg. 13 Class II Administration Update.

AIR QUALITY PERMIT NOTICE

Notice of Application

Notice is given that ICL-IP America, Inc. has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Class II Permit Administrative Update for a chemical manufacturing operation located on State Route 2, in Gallipolis Ferry in Mason County, West Virginia. The latitude and longitude coordinates are: 38.77303 and -82.20183. Startup of operations is scheduled to begin on August 1, 2015.

The applicant estimates the maximum increase in potential in the following regulated air pollutants on a facility-wide basis will be:

Sulfur Dioxide (SO₂) = 0.03 tpy
Hazardous Air Pollutants (HAPs) = 0.03 tpy
Carbon Dioxide Equivalents (CO₂e) = 67.95 tpy

Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

Dated this the XXth day of September, 2015.

By: ICL-IP America, Inc.
John Kadlec
Director of Operations
11636 Huntington Road
Gallipolis Ferry, WV 25515

Attachment Q
Business Confidential Claims

There is no confidential information associated with this permit application.

Attachment R – Authority Form

This update does not include authority forms as the document is signed by the responsible official.

Attachment S
Title V Permit Revision Information

1. New Applicable Requirements Summary	
Mark all applicable requirements associated with the changes involved with this permit revision:	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS (Subpart(s) _____)	<input type="checkbox"/> Section 112(d) MACT standards (Subpart(s) _____)
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) ⁽¹⁾
<input type="checkbox"/> NO _x Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO _x Budget Trading Program EGUs (45CSR26)
⁽¹⁾ If this box is checked, please include Compliance Assurance Monitoring (CAM) Form(s) for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application).	

2. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

- SIP/FIP - Not specifically a list facility under either plan.
- NESHAP (45CSR15) – No NESHAP standards apply.
- Section 111 NSPS – No NSPS standards are applicable.
- Section 112(g) - Case-by-case MACT – Facility is not a major source of HAP emissions.
- Section 112(j) - MACT Hammer – Facility is not a major source of HAP emissions.
- Section 129 – ICL-IP America, Inc. does not own a solid waste incinerator.
- Section 183(f) - Facility does not own or operate any tank vessels per section 183(f) and is located in an ozone attainment area.
- NAAQs - Facility is a permanent source and not a contemporary source.
- 45CSR19 - Facility is located in an attainment area.
- 45 CSR 2 – No added indirect heat exchangers.
- 45 CSR 4 - No imposed requirements per 45CSR4.
- 45 CSR 6 – There are no on-site incinerators, flares, or open burning associated with this update.
- 45 CSR 14 – Facility has no PSD permits and revision will not trigger thresholds.
- 45 CSR 25 – This update does not involve the storage, treatment, or disposal of hazardous waste.
- 45 CSR 27 – The emission of toxic air pollutants is unchanged by this administrative update.
- 45 CSR 28 – No emissions are banked or traded per this regulation.
- 45 CSR 1 - Boilers maximum heat input are less than section 4's 250mm BTU/hr applicability.
- 45 CSR 19 - Facility has no PSD permits and revision will not trigger thresholds.
- Section 112(d) MACT standards – Facility is not a major source of HAP emissions.
- 112(r) RMP – Does not affect facility's RMP.
- Section 183 (e) - Facility does not produce a 183(e) listed consumer or commercial product.
- Stratospheric ozone (Title VI) – Revision does not involve any regulate pollutant.
- Emission Cap 45CSR section 30-2.6.1 - Facility has no emission cap agreement per section 2.6.1.
- 45CSR33 - Facility is not subject to the Acid Rain provisions listed in section 1.5.
- (40CFR64) – Monitoring requires have already been established.
- 45CSR26 - Boilers are not defined as EGU's.
- Section 112(i) - Early HAP reduction - Facility did not utilize the early reduction program.

Permit Shield Requested (*not applicable to Minor Modifications*)

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision? Yes No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R30-05300007-2015	08/11/2015	
R13-2438P	09/30/2013	
	/ /	

5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
NA	MM/DD/YYYY	
	/ /	
	/ /	

6. Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY
NO _x	-1.10
CO	-0.20
SO _x	0.00
PM ₁₀	-0.09
PM _{2.5}	-0.09
VOC	-0.11
HAPs	0.03
CO _{2e}	67.95

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

7. Certification For Use Of Minor Modification Procedures (Required Only for Minor Modification Requests)

Note: This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:

- i. Proposed changes do not violate any applicable requirement;
- ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;
- iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;
- v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;
- vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed):  Date: 9 / 8 / 15
 (Please use blue ink) (Please use blue ink)

Named (typed): John W. Kadlec Title: Director of Operations

Note: Please check if the following included (if applicable):

- Compliance Assurance Monitoring Form(s)
- Suggested Title V Draft Permit Language

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.