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January 29, 2015

Beverly McKeone, NSR Program Manager
Division of Air Quality
West Virginia Department of Environmental Protection
601 57th Street, SE
Charleston, WV 25304

Subject: Allmine Paving, LLC
Inwood, WV Facility
Permit No. R13-2828E, Request for Determination

Dear Ms. McKeone:

Allmine Paving, LLC (Allmine) was issued Permit No R13-2828E (Permit) on November 25, 2014 authorizing the installation and operation of an asphalt processing and storage facility in Inwood, WV. As described in the permit application submitted in January 2010 and AP-42 Section 11.2.2, the processing of asphalt involves the oxidation of raw material by "blowing" air through it at elevated temperatures. The processing reaction is exothermic; therefore, the process vessel or blowstills require cooling during the process cycle.

The four (4) Allmine process vessels were initially operated with external cooling using water jacketing to apply/manage the cooling water at the process vessel shell. Due to a recent malfunction in the water jacket on Process Vessel #2, Allmine will modify the cooling process to bypass the cooling jackets, apply the external cooling water using a spray system, and manage the excess water without the cooling jackets. The elimination of the cooling jackets will have no effect on the emissions from the process vessels and/or control provided by the DFTOs.

Additionally, Allmine can utilize the option of injecting cooling water internally to the process vessels using the catalyst injection system. Internal cooling can change the moisture content and volume of the emission stream from the process vessels.

The DFTOs were designed to control the emissions from the tanks and process vessels, as well as to use the heat for process heating. TAMKO contacted the manufacturer of the DFTOs, Nacah Tech LLC, to determine whether the performance of the DFTOs would be affected negatively by use of internal cooling. Nacah Tech has stated that its analysis showed that the DFTOs are still capable of controlling the emissions (minimum residence time of 0.75 sec. and minimum control efficiency of 98% for VOC and HAP emissions) with the additional moisture generated by internal cooling in the emission steam. Certain operating adjustments must be made to the DFTO/Heat Recovery Unit to provide for additional heating and heat dissipation associated with the increase in moisture.

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Nacah Tech LLC has also told Allmine that engineering tests should be performed for Nacah Tech to provide a guaranteed minimum destruction removal efficiency (DRE) while operating with process vessel internal cooling. Allmine plans to begin a series of internal cooling trials using Process Vessel #4 and controlled by the DFTOs starting in January 2015. Upon successful completion of the trials and full implementation of the operating change, Allmine will complete the engineering testing to allow Nacah Tech to provide the DRE guarantee. Although unanticipated, any deviation in the DFTO performance will be reported in accordance with permit condition 5.5.1.

TAMKO Building Products, Inc. (TAMKO) operates the same process at a sister facility in Joplin, MO. The Rangeline plant processes asphalt using internal cooling like that proposed for the Allmine process. Metco Environmental conducted compliance testing of blowstill emissions control technology at both the Allmine and Joplin plants. The results of the testing are summarized below:

	GACT Particulate Matter (lbs/ton)	GACT Particulate Matter (lbs/hr)	Non-Methane/Non-Ethane Volatile Organic Compounds Emissions as Propane (lbs/hour)
Allmine DFTO#1 (2011)	0.061	1.01	<0.01
Allmine DFTO#2 (2011)	0.08	1.28	<0.01
TAMKO Rangeline Large DFTO (June 2010)	0.04	0.49	0.11

The above data demonstrates that the emissions from Allmine's DFTOs while operating the blowstills with internal cooling will not cause the emissions to exceed the permitted limits.

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Allmine understands that the change in method of operation using internal cooling will not be considered a permit modification as 1) there is no required changed to the current permit, 2) there is no change to the application, and 3) there is no increase in permitted emissions.

Allmine submits this Request for Determination to confirm the above understanding and to ensure the WVDEP has no objections to Allmine's plan.

Thank you in advance for your assistance with this permitting related request. Please contact Brett Wolfington at (304) 262-1485 X6501 or Steve Szczepanik at (417) 624-6644 X2123 if you have any questions regarding this request.

Best regards,
For Allmine Paving, LLC by

Brett Wolfington
General Manager

Cc: Steve Szczepanik, TAMKO Environmental Affairs Manager

Submitted via Certified Mail 7013 1090 0001 3770 5710