



west virginia department of environmental protection

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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
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PERMIT DETERMINATION MEMORANDUM

To: Bev McKeone
From: Jerry Williams
Date: February 19, 2016
Subject: PD15-050, Allmine Paving – Inwood Facility (003-00137)

UTM Northing: 4365.70 km
UTM Easting: 757.59 km
Latitude: 39.402368
Longitude: -78.008484
Location: Inwood, Berkeley County



SUMMARY

Allmine Paving submitted PD16-016 on February 1, 2016. PD16-016 was submitted to replace Knockout Tank #1 with a new unit. The knockout tank is used to condense and remove oil and water from the process exhaust prior to control at DTFO1. The knockout tank will be as effective as the existing knockout tank and will not result in any new or increased emissions from the process. The replacement knockout tank will be operated in accordance with the current permit conditions.

There are no emission increases associated with this proposed like kind replacement. Furthermore, this proposal does not alter prior permit applications, nor would there be any necessary changes made to current Permit R13-2828E.

45CSR13 Section 2.17 defines a 'modification' as any physical change in or change in the method of operation of any existing stationary source, excluding any emissions unit which meets or falls below the criteria delineated in Table 45-13B (de minimis sources), which:

- Results in an emissions increase of six (6) pounds per hour and ten (10) tons per year or more, or more than 144 pounds per calendar day, of any regulated air pollutant
- Results in an emissions increase of 2 pounds per hour or 5 tons per year of hazardous air pollutants considered on an aggregated basis
- Results in an increase in emissions of an air pollutant listed in Table 45-13A of 10 percent or more of the amount set forth in Table 45-13A at a facility which, prior to the physical change or change in method of operation, has the potential to emit the air pollutant at or above the amount set forth in Table 45-13A; provided that nothing in this subdivision shall affect the facility's obligation to comply with 45CSR27
- Results in an increase in emissions of any air pollutant listed in Table 45-13A that would in turn result in total emissions of the air pollutant at the stationary source equal to or greater than the amounts in Table 45-13A
- Results in any regulated air pollutant emissions increase for which the owner or operator of a source voluntarily chooses to obtain a modification permit pursuant to this rule, even though the owner or operator is not otherwise required to do so

It is my opinion that a permit is not required for the proposed knockout tank change based upon the submitted permit determination which indicates that there will be no increase in emissions; or, trigger a substantive requirement of any State or Federal air quality regulation.