



Laura
13-2334 X
029-00008

DEC 29 2014

CERTIFIED MAIL – 7011 1570 0002 7895 7903

December 19, 2014

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

Re: Ergon – West Virginia, Inc., Newell, WV
Class II Administrative Update

Dear Ms. McKeone,

Ergon – West Virginia, Inc. (EWWI) is submitting the enclosed Class II Administrative Update Application (and three (3) photocopies). Check No. 777244 in the amount of \$300.00 has been included for payment of the application fee. The purpose of this administrative update is to correct the emission limit for the MEK-TOL solvent dewaxing unit. During a recent review, it was determined that an incorrect calculation was used. The valve leak rate calculation was inadvertently used for the pump leak rate calculation, which resulted in a lower potential to emit (PTE). This administrative update will correct this error. The facility would also like to add connectors to the emission estimate. The MEK-TOL fugitive emission limit was originally permitted in R13-2334E issued May of 2004, and this correction should not be included in PSD determination(s) related to recent projects.

If you have any questions, please call me at our Jackson, Mississippi office at (601) 933-3123.

Sincerely,

Ergon – West Virginia, Inc.

A handwritten signature in black ink that reads 'Jake Neihaus'.

Jake Neihaus, RPG, CHMM
Sr. Environmental Scientist
Office: 601.933.3123
Fax: 601.933.3369
Mobile: 601.209.6786
jake.neihaus@ergon.com

Enclosure – Class II Administrative Update Application (original and three (3) copies)

CC: Jack Azar – EWWI
Ray Callahan – EHS
File (48 – E – 01 – 03 -)



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):
 Ergon – West Virginia, Inc.

2. Federal Employer ID No. (FEIN):
 721375114

3. Name of facility (if different from above):
 Ergon – West Virginia, Inc. (EWWI)

4. The applicant is the:
 OWNER OPERATOR BOTH

5A. Applicant's mailing address:
 9995 Ohio River Blvd Route 2 South

 Newell, WV 26050

5B. Facility's present physical address:
 9995 Ohio River Blvd Route 2 South

 Newell, WV 26050

6. **West Virginia Business Registration.** Is the applicant a resident of the State of West Virginia? YES 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 *proposed site*? YES NO
 – If YES, please explain: This is an existing site owned by Ergon – West Virginia, Inc.

 – 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.): The facility is a petroleum refinery that is updating permit language through the administrative update process.

10. North American Industry Classification System (NAICS) code for the facility:
 2911

11A. DAQ Plant ID No. (for existing facilities only):
 029-00008

11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):
 R13-2334W, R30-02900008-2010

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>Two (2) miles south of Newell, WV on State Route 2</p>		
12.B. New site address (if applicable): N/A	12C. Nearest city or town: Newell, WV	12D. County: Hancock
12.E. UTM Northing (KM): 4495.1	12F. UTM Easting (KM): 531.0	12G. UTM Zone: 17
<p>13. Briefly describe the proposed change(s) at the facility: EWWI would like to correct the fugitive emission limit for the MEK-TOL solvent dewaxing unit.</p>		
<p>14A. Provide the date of anticipated installation or change: N/A</p> <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: / / 		<p>14B. Date of anticipated Start-Up if a permit is granted: N/A</p>
<p>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).</p>		
<p>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</p>		
<p>16. Is demolition or physical renovation at an existing facility involved? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>		
<p>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.</p>		
<p>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.</p>		
<p>Section II. Additional attachments and supporting documents.</p>		
<p>19. Include a check payable to WVDEP – Division of Air Quality with the appropriate application fee (per 45CSR22 and 45CSR13).</p>		
<p>20. Include a Table of Contents as the first page of your application package.</p>		
<p>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).</p> <ul style="list-style-type: none"> Indicate the location of the nearest occupied structure (e.g. church, school, business, residence). 		
<p>22. Provide a Detailed Process Flow Diagram(s) showing each proposed or modified emissions unit, emission point and control device as Attachment F.</p>		
<p>23. Provide a Process Description as Attachment G.</p> <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). 		
<p>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</p>		
<p>24. Provide Material Safety Data Sheets (MSDS) for all materials processed, used or produced as Attachment H.</p> <ul style="list-style-type: none"> For chemical processes, provide a MSDS for each compound emitted to the air. 		
<p>25. Fill out the Emission Units Table and provide it as Attachment I.</p>		
<p>26. Fill out the Emission Points Data Summary Sheet (Table 1 and Table 2) and provide it as Attachment J.</p>		
<p>27. Fill out the Fugitive Emissions Data Summary Sheet and provide it as Attachment K.</p>		

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 type="checkbox"/> Indirect Heat Exchanger | |
| <input type="checkbox"/> General Emission Unit, specify | | |

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 Paul W. Young, Jr.
(Please use blue ink)

DATE: 12/19/2014
(Please use blue ink)

35B. Printed name of signee: Mr. Paul W. Young, Jr

35C. Title: VP of Regulatory Affairs

35D. E-mail: paul.young@ergon.com

36E. Phone: 601.933.3000

36F. FAX: 601.933.3369

36A. Printed name of contact person (if different from above): Jake Neihaus

36B. Title: Sr. Environmental Scientist

36C. E-mail: jake.neihaus@ergon.com

36D. Phone: 601.933.3123

36E. FAX: 601.933.3369

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

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

3% Leak Rate	Valves		Pumps		EPA Correlation Approach ¹			
	Total	Leakers	Total	Leakers	Valves	Pumps ²	Leak Rate Total (lbs/yr)	Leak Rate Total (tons/yr)
	1253	38	56	2	0.42579	0.01445	8,484.30	4.24

Notes/Assumptions

1 - The following assumptions were made for the Screening Value Method:

- a. The screening value (SV) for each non leaking component was 1 ppm less than the leak definition of 500 ppm for valves and 2,000 ppm for pumps
- b. The screening value (SV) for all leaky components was 20,000 ppm
- c. The equations listed below were used to calculate the leak rate

$$\text{Leak Rate}_{\text{valves}} \text{ (kg/hr)} = (\# \text{ of non-leakers}) * 2.29\text{E-}06 * (\text{SV})^{0.746} + (\# \text{ of leakers}) * 2.29\text{E-}06 * (\text{SV})^{0.746}$$

$$\text{Leak Rate}_{\text{pumps}} \text{ (kg/hr)} = (\# \text{ of non-leakers}) * 5.03\text{E-}05 * (\text{SV})^{0.610} + (\# \text{ of leakers}) * 5.03\text{E-}05 * (\text{SV})^{0.610}$$

d. The leak rate for leaky and non-leaky components were added together

Example (3% Leak Rate):

$$\text{Leak Rate}_{\text{valves}} \text{ (kg/hr)} = (1215) * 2.29\text{E-}06 * (499)^{0.746} + (38) * 2.29\text{E-}06 * (20,000)^{0.746} = 0.42579$$

$$\text{Leak Rate}_{\text{pumps}} \text{ (kg/hr)} = (54) * 5.03\text{E-}05 * (1,999)^{0.610} + (2) * 5.03\text{E-}05 * (20,000)^{0.610} = 0.01445$$

e. The Total (lbs/yr) represents the sum of valves and pumps converted to lbs/yr as follows:

$$\text{Total (lbs/yr)} = (\text{Leak Rate}_{\text{valves}} \text{ (kg/hr)} + \text{Leak Rate}_{\text{pumps}} \text{ (kg/hr)}) * 8,760 \text{ hr/yr} * 2.2 \text{ lbs/kg}$$

Example (3% Leak Rate):

$$\text{Total (lbs/yr)} = (0.42579 \text{ kg/hr} + 0.01445 \text{ kg/hr}) * 8,760 \text{ hr/yr} * 2.2 \text{ lbs/kg} = 8,484.30 \text{ lbs/yr}$$

2 - The formula in the leak rate calculation for pumps was incorrect. The formula for leak rate from valves was inadvertently used.

3% Leak Rate	Valves		Pumps		Connectors		EPA Correlation Approach ¹				
	Total Leakers	56	Total Leakers	24	Total Leakers	3258	Valves	Pumps	Connectors ³	Leak Rate (kg/hr)	Total (lbs/yr)
1863	56		24	1	3258	0	0.63308	0.13602	0.81450	30,519.09	15.26

Notes/Assumptions

1 - The following assumptions were made for the EPA Correlation Approach:

- a. The screening value (SV) for each non leaking component was 1 ppm less than the leak definition of 500 ppm for valves and 2,000 ppm for pumps
- b. The screening value (SV) for all leaky components was 20,000 ppm
- c. The equations listed below were used to calculate the leak rate

$$\text{Leak Rate}_{\text{valves}} \text{ (kg/hr)} = (\# \text{ of non-leakers}) * 2.29E-06 * (\text{SV})^{0.746} + (\# \text{ of leakers}) * 2.29E-06 * (\text{SV})^{0.746}$$

$$\text{Leak Rate}_{\text{pumps}} \text{ (kg/hr)} = (\# \text{ of non-leakers}) * 5.03E-05 * (\text{SV})^{0.610} + (\# \text{ of leakers}) * 5.03E-05 * (\text{SV})^{0.610}$$

d. The leak rate for leaky and non-leaky components were added together

Example (3% Leak Rate):

$$\text{Leak Rate}_{\text{valves}} \text{ (kg/hr)} = (1803) * 2.29E-06 * (499)^{0.746} + (56) * 2.29E-06 * (20,000)^{0.746} = 0.63308$$

$$\text{Leak Rate}_{\text{pumps}} \text{ (kg/hr)} = (23) * 5.03E-05 * (1,999)^{0.610} + (1) * 5.03E-05 * (20,000)^{0.610} = 0.13602$$

e. The Total (lbs/yr) represents the sum of valves and pumps converted to lbs/yr as follows:

$$\text{Total (lbs/yr)} = (\text{Leak Rate}_{\text{valves}} \text{ (kg/hr)} + \text{Leak Rate}_{\text{pumps}} \text{ (kg/hr)} + \text{Leak Rate}_{\text{connectors}} \text{ (kg/hr)}) * 8,760 \text{ hr/yr} * 2.2 \text{ lbs/kg}$$

Example (3% Leak Rate):

$$\text{Total (lbs/yr)} = (0.63308 \text{ kg/hr} + 0.13602 \text{ kg/hr} + 0.81450 \text{ kg/hr}) * 8,760 \text{ hr/yr} * 2.2 \text{ lbs/kg} = 30,519.09 \text{ lbs/yr}$$

2 - The component count(s) have been updated since the initial permit limit calculation

3 - As connectors are not monitored by Method 21, the Refinery average emission factor for connectors (0.00025 kg/hr) was used. Reference - *Protocol for Equipment Leak Emission Estimates* (EPA-453/R-95-017, November 1995) Table 2-10

ATTACHMENT A
BUSINESS CERTIFICATE

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

ISSUED TO:
**ERGON-WEST VIRGINIA INC
9995 OHIO RIVER BLVD
NEWELL, WV 26050-1195**

BUSINESS REGISTRATION ACCOUNT NUMBER: 1050-8935

This certificate is issued on: **06/11/2010**

*This certificate is issued by
the West Virginia State Tax Commissioner
in accordance with W.Va. Code § 11-12.*

*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.

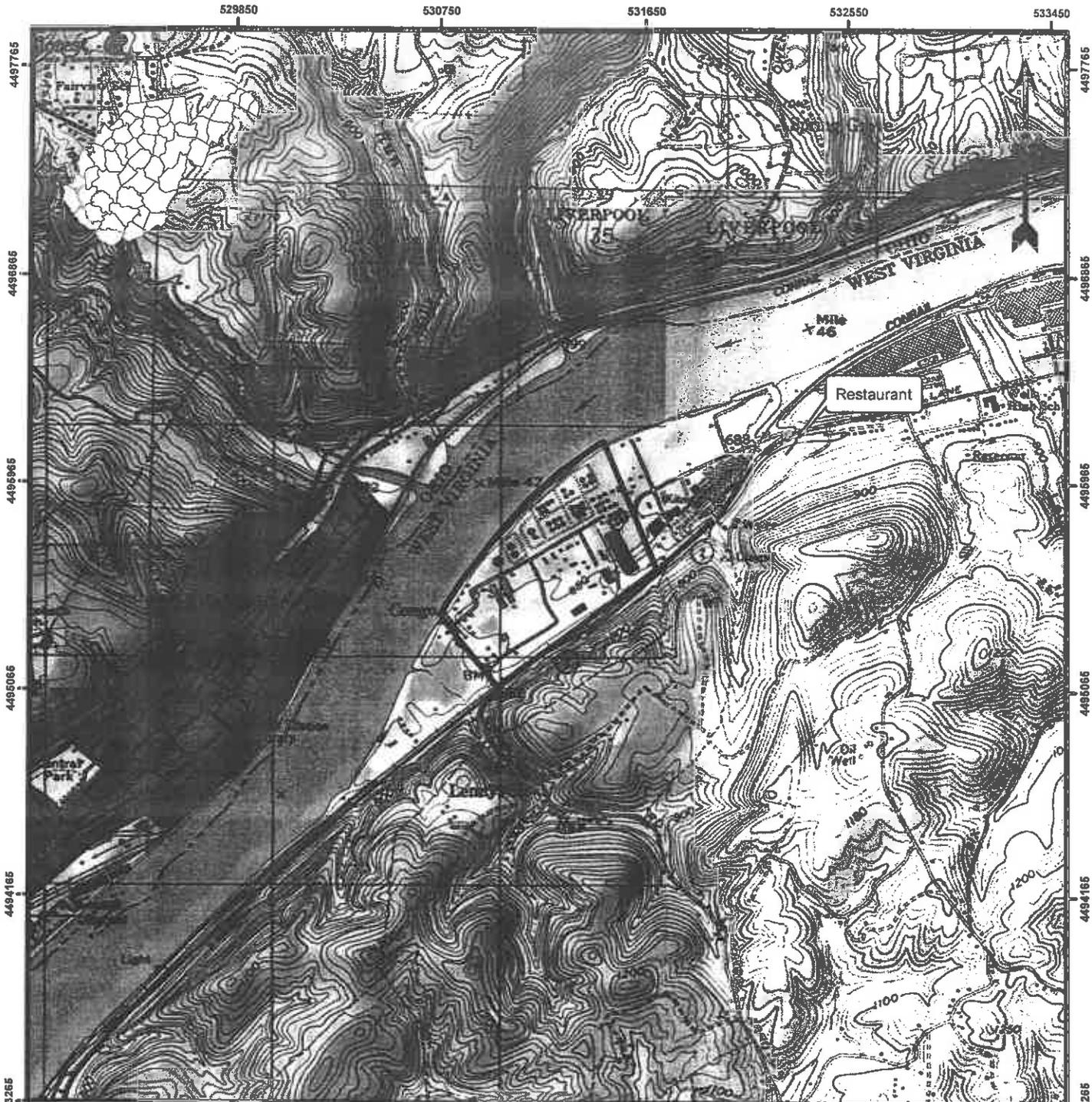
This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

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.**

ATTACHMENT B

LOCATION MAP



Legend

 Property Boundary

Reference

Base map comprised of U.S.G.S. 7.5 minute topographic maps, "East Liverpool North, WV", "East Liverpool South, WV", "Westville, WV", and "West Point, OH".

Site Location Map

Permit Amendment Application
Newell, Hancock County, West Virginia

Ergon-West Virginia, Inc
Newell Refinery



Drawn By	JCS	03/20/12
Checked By	LMM	03/20/12
Approved By	LMS	03/20/12

Project Number 098-023	B Attachment
Drawing Number 098-023-A003	

ATTACHMENT S

TITLE V PERMIT REVISION INFORMATION

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). If this box is not checked, please explain why **Compliance Assurance Monitoring** is not applicable:

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.

N/A

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
	MM/DD/YYYY	
R13-2334W	11/18/2014	
	/ /	

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
	MM/DD/YYYY	
	/ /	
	/ /	

6. Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY
N/A	

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: 12/19/2014
(Please use blue ink) (Please use blue ink)
 Named (typed): Paul W. Young, Jr Title: VP of Regulatory Affairs

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.

APPLICATION FEE