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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 *JW*  
**Date:** June 24, 2015  
**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 PD15-050 on June 22, 2015. PD15-050 was submitted to replace Process Vessel #2 with a new unit. Previously on January 29, 2015 Allmine submitted a permit determination request due to a malfunction of the water jacket on Process Vessel #2. The replacement vessel for Process Vessel #2 is the same dimensions as the existing unit, will be operated in accordance with the current permit conditions and is controlled by Direct Fired Thermal Oxidizer #1 (DFTO-1). Process Vessel #2 (blowstill) is included in Emission Unit 3S of Permit No. R13-2828E and is subject to NSPS 40CFR60 Subpart UU and NESHAP 40CFR63 Subpart AAAAAAA.

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 like kind process vessel 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.