

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



February 23, 2016

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 I Administrative Update Application
Gallipolis Ferry Plant
ICL-IP America, Inc.**

Dear Director Durham:

ICL-IP America, Inc. (ICL) is pleased to submit this written request for a Class I Administrative Update to an existing R13-2438R permit issued December 18, 2015 for the 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. Based upon his familiarity with recent ICL permitting actions, it is requested that Mr. John Legg be considered for the permitting engineer for this submittal.

ICL submits this request in order to request several changes to the permit be issued. These changes are listed below:

- Sections 4.1.18.10 and 4.2.11 states that the 237 hp diesel engine (Emission Unit ID: P-434) requires a back pressure monitor. As the engine does not include a diesel particulate filter and is certified without treatment devices, a back pressure monitor is not required by federal regulation.
- The second footnote in Table 4.1.18.3 incorrectly sites section 4.1.18.8 as opposed to 4.1.18.7.
- There is an extra section sign "§" located in the citation listed in the text of section 4.1.18.11 in the permit.

Regarding the first of these requested changes, the permit incorrectly cites the 40 CFR § 60.4209(b). The regulation states, "If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in §60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached." The diesel engine in question is an EPA certified engine under certificate number FJDXL06.812. The certification states the engine passed



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performance tests without treatment devices installed. As such, ICL requests that permit sections 4.1.18.10, and 4.2.11 be removed so that the issued permit more properly reflects the compliance actions required for the permitted engine.

The remaining two items listed are typographical errors and require only minor changes to the permit. These changes do not alter the permit conditions.

No further updates are requested with this submittal. To aid the WVDEP, Division of Air Quality the EPA certification for the diesel engine (Emission Unit ID: P-434), is being included with the submittal of this Class I Administrative Update.

If you have any questions about the information submitted or if you would like to discuss this project, please do not hesitate to contact J.B. Turley, Environmental Engineer, at (304) 674-6433.

Sincerely,

A handwritten signature in blue ink that reads "John W. Kadlec".

John W. Kadlec
Director of Operations

ICL-IP America, Inc.

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

Enclosures

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