

To: File
From: John Legg
Date: March 16, 2016



Subj: R13-2438S - Class I Administrative Update
ICL-IP America Inc., Gallipolis Ferry, Mason County, WV
Company ID No.: 054-00007
Permit IDNo.: R13-2438S

This Class I Administrative Update was received on March 2, 2016 and was assigned to the writer on March 7, 2016. No permitting fee or legal advertisement is required for a Class I Administrative Update.

ICL-IP requested that the followed items be changed in R13-2438R:

- Sections 4.1.18.10 and 4.2.11 state that the 237 hp diesel emergency firewater pump 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.

ICL-IP 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, i.e., the sections requiring a back pressure monitor were removed from the permit.

- The second footnote in Table 4.1.18.3 incorrectly sites section 4.1.18.8 as opposed to 4.1.18.7.

A correction was made to the second footnote in Table 4.1.18.3.

- There is an extra section sign “§” located in the citation listed in the text of section 4.1.18.11 in the permit.

The extra section sign “§” was removed from section 4.1.18.11.

A compare file was generated comparing new permit R13-2438S to old permit R13-2438R. The pages of the compare file where changes were made are attached to this evaluation.

WordPerfect Document Compare Summary

Original document: Q:\AIR_QUALITY\LEGG\ICL-IP America,
Inc\R13-2438R\053-00007_PERM_13-2438R.wpd

Revised document: @PFDesktop\MyComputer\Q:\AIR_QUALITY\LEGG\ICL-IP America,
Inc\R13-2438S\053-00007_PERM_13-2438S.wpd

Deletions are shown with the following attributes and color:

~~Strikeout~~, **Blue** RGB(0,0,255).

Deleted text is shown as full text.

Insertions are shown with the following attributes and color:

Double Underline, Redline, **Red** RGB(255,0,0).

The document was marked with 15 Deletions, 15 Insertions, 0 Moves.

Compare File
comparing R13-2438S to
previous permit R13-2438R.

Permit for Class HI Administrative Update



R13-2438RS

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
ICL-IP
Gallipolis Ferry
053-00007

William F. Durham
Director

Issued: ~~December~~ March 186, 20156

This permit will supersede and replace Permit R13-2438Q.

Facility Location: Gallipolis Ferry, Mason County, West Virginia
Mailing Address: PO Box 1721, Gallipolis Ferry, WV
Facility Description: Specialty Chemical Manufacturing Facility
SIC Codes: 2899 – Chemicals and Allied Products – Chemical Preparations, NEC
2869 – Chemicals and Allied Products – Industrial Organic Chemicals, NEC
UTM Coordinates: 396.50 km Easting • 4,292.30 km Northing • Zone 17
Permit Type: Class HI Administrative Update
Description: This update will replace an 1976 year, 190 hp emergency diesel firewater pump (Emission Unit ID No. P-434) with a 2015 year, 237 bhp (177 kW) Remove permit sections 4.1.18.10 and 4.2.11. These sections incorrectly required that a back pressure monitor be installed for the 237 hp diesel emergency firewater pump. The new 2015 emergency firewater pump is EPA compliant/certified to meet the requirements of 40 CFR 60 Subpart III. The manufacture and model number for the new diesel firewater pump are: John Deere Clarke, Model JUGH-UFAD88. The EPA Certificate Number is FJDXL06.8120-004 engine (Emission Unit ID: P-434). Correct two (2) minor typographical errors.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits and Procedures for Evaluation*

2.4. Term and Renewal

- 2.4.1. This permit supercedes and replaces previously issued Permit R13-2438~~OR~~. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2438 through ~~R13-2438R~~R13-2438S and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to; [45CSR§§13-5.11 and 13-10.3]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

4.1.18.2 The following table provides a list of diesel engines authorized to operate at the subject facility by this permit. The units shall not exceed the specified maximum brake-horsepower, shall utilize the specified control device, and shall not exceed the specified maximum hours of operation.

Table 4.1.18.2: Diesel Engine Specifications

ID No.	Brake Horsepower	Control Device(s)	Maximum Annual Hours of Operation
C-120	128.00	None	500
C-209	78.00	None	500
OM-183	350.00	None	500
OM-184	350.00	None	500
OM-231	368.80	None	500
OM-296	368.80	None	500
P-434	237.00	None	500

4.1.18.3 Emissions resulting from the operation of the sources identified under 4.1.18.1 and 4.1.18.2 shall not exceed those limits as specified in the following table:

Table 4.1.18.3: Combustion Unit Emission Limits

ID No.	CO		NO _x		PM ⁽¹⁾		SO ₂		VOC	
	pph	tpy	pph	tpy	pph	tpy	pph	tpy	pph	tpy
Boiler B-6	7.68	33.70	9.18	40.20	0.70	3.08	0.06	0.25	0.47	2.05
Boiler B-5A	10.00	43.80	24.40	106.80	0.91	4.00	0.07	0.32	0.61	2.67
Heater F-5	0.67	2.95	0.80	3.52	0.06	0.27	0.01	0.02	0.04	0.18
Heater F-6	0.52	2.30	0.63	2.75	0.05	0.21	0.00	0.02	0.03	0.14
Heater F-7	0.06	0.27	0.07	0.32	0.01	0.03	0.01	0.01	0.01	0.02
Heater F-8	0.06	0.27	0.07	0.32	0.01	0.03	0.01	0.01	0.01	0.02
C-120	1.74	0.43	8.06	2.00	0.57	0.14	0.53	0.13	0.66	0.16
C-209	0.40	0.10	1.85	0.46	0.13	0.03	0.12	0.03	0.15	0.04
OM-183	2.34	0.58	10.90	2.71	0.77	0.19	0.72	0.18	0.88	0.22
OM-184	2.34	0.58	10.90	2.71	0.77	0.19	0.72	0.18	0.88	0.22
OM-231	2.47	0.62	11.50	2.87	0.81	0.20	0.76	0.19	0.93	0.23
OM-296	2.47	0.62	11.50	2.87	0.81	0.20	0.76	0.19	0.93	0.23
P-434 ⁽²⁾	0.47	0.12	1.48	0.37	0.05	0.01	0.49	0.12	0.05	0.01

(1) All particulate matter emissions are assumed to be PM₁₀ or less.

(2) Emissions certified by firewater pump engine manufacturer (see Section 4.1.18.87 below).

4.1.18.4 The fuel burning units, identified as Boiler B-6 and Boiler B-5A, are subject to the applicable limitations and standards under 45CSR2, as given below under (a) through (c).

- a The permittee shall not cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from the fuel burning units which is greater than ten (10) percent opacity based on a six minute block average.
[45CSR§2-3.1]

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~~X4.1.18.10. The firewater pump which is equipped with a diesel particulate filter must install a back pressure monitor that notifies the permittee when the high back pressure limit of the engine is approached.~~

~~[40 CFR§60.4209(b)] (P-434)~~ 4.1.18.10.

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4.1.18.11. The permittee must operate and maintain the firewater pump engine such that it achieves the emission standards as required in §§~~60~~§60.4205 over the entire life of the engine.
[40 CFR§60.4206] (P-434)

4.1.18.12. The firewater pump engine must be installed and configured according to the manufacturer's emission-related specifications.
[40 CFR§60.4211(c)] (P-434)

4.1.18.13. The permittee shall operate the emergency firewater pump engine according to the requirements listed below:

- (1) There is no time limit on the use of the above engine in emergency situations.
- (2) The permittee may operate the above engine for any combination of purposes specified below for a maximum of 100 hours per calendar year.

- (i) The above engine may be operated for maintenance checks and readiness testing provided that the tests are recommended by federal, state or local government or the manufacturer. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks or readiness testing, but a petition is not required if the permittee maintains records indicating the federal, state or local standards require maintenance and testing of the above engine beyond 100 hours per calendar year.

- (iii) The above engine may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

- (3) The emergency firewater pump may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in paragraph (2) of this section. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[40 CFR§60.4211(f)] (P-434)

4.1.18.14. If the permittee does not install, configure, operate, and maintain the emergency firewater pump engine according to the manufacturer's emission-related written instructions, or if the permittee changes the emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:

- (2) The permittee must keep a maintenance plan and records of conducted maintenance and

- a. Install, calibrate, maintain, and operate equipment to monitor the amount of natural gas that is consumed in Boiler B-5A.
 - b. Install, calibrate, maintain, and operate equipment to monitor the hours of operation of each boiler (with the exception of Boiler B-5A) so as to calculate the amount of natural gas that is consumed.
 - c. Monitor or calculate, as applicable, and record the monthly and rolling twelve month total amount of natural gas that is consumed in each boiler.
- 4.2.6. For the purposes of demonstrating compliance with maximum hours of operation limits set forth in Table 4.1.18.2, the permittee shall:
- a. Install, calibrate, maintain, and operate equipment to monitor the hours of operation of each diesel engine.
 - b. Monitor and record the monthly and rolling twelve month total hours of operation for each unit.
- 4.2.7. The permittee shall install, calibrate, maintain, and operate CEMS for measuring NO_x and O₂ (or CO₂) emissions discharged to the atmosphere from Boiler B-5A, and shall record the output of the system; or monitor steam generating unit operating conditions and predict NO_x emission rates as specified in a plan submitted pursuant to 40 CFR §60.49b(c).
[40 CFR §60.48Db(b)(1) and 40 CFR §60.44Db(g)(2)]
- 4.2.8. The permittee shall, with respect to Boiler B-5A, comply with all applicable monitoring, record-keeping, and reporting requirements of 40 CFR 60, Subpart Db, provided that the permittee meet any more stringent limitations set forth in this permit.
- 4.2.9. The permittee shall comply with all applicable monitoring, record-keeping, and reporting requirements of 45CSR2, 45CSR10, and 40 CFR 63, Subpart H, provided that the permittee meet any more stringent limitations set forth in this permit.
- 4.2.10. The permittee is not required to submit an initial notification for the emergency firewater pump engine. The permittee is required to keep records of the operation of the firewater pump engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time.
[40 CFR §60.4214(b)] (P-434)
- 4.2.11. ~~The permittee shall keep records of any corrective action taken after the back pressure monitor for the emergency firewater pump engine has notified the permittee that the high back pressure limit of the engine is approached.~~
~~[40 CFR §60.4214(c)] (P-434)~~

[Reserved]

4.3. Testing Requirements

- 4.3.1. The permittee shall continue the application of all previously agreed upon performance testing schedules including those specified under previous iterations of this permit and those agreed upon with the Director outside the scope of a permitting action. Further, at such reasonable time(s) as the Director may designate, the permittee shall conduct or have conducted additional performance tests to determine compliance with the emission limits under Section 4.0 of this permit according to the procedures under 3.3.1.
- 4.3.2. The permittee shall meet all applicable testing requirements of 45CSR2, 45CSR10, 40 CFR 60, Subpart Db, and 40 CFR 63, Subpart H, provided that the permittee meet any more stringent limitations set forth in this permit.