



An Ergon Company  
P.O. Box 1639  
Jackson, MS  
39215-1639  
601-933-3000  
ergon.com

CERTIFIED MAIL – 7012 1640 0002 3596 8802

September 19, 2016

Mr. Joe Kessler  
West Virginia Department of Environmental Protection  
Department of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304

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

Dear Mr. Kessler,

Ergon-West Virginia, Inc. (EWVI) is submitting the enclosed Class II Administrative Update Application (and two CD's). Check No. 844163 in the amount of \$300 has been included for payment of the application fee.

The requested change is for the addition of a 2,500 bbl biodiesel storage tank. The new tank will not require the modification of any throughput limits as the current permit limit for truck and marine loading is sufficient for the addition of this tank. This addition will result in emissions less than the modification thresholds of 6 pounds per hour (lb/hr) and 10 tons per year (tpy) of any regulated pollutant and 2 lb/hr or 5 tpy of aggregated hazardous air pollutants (HAP). Therefore, this application is submitted as an Administrative Update (Class II).

If you have any questions, please call me at our Jackson, MS office at (601) 933-3122 or Jake Neihaus at (601) 933-3122.

Sincerely,

Ergon-West Virginia, Inc.

Katelan Crain  
Environmental Engineer  
Office: 601-933-3122  
Mobile: 601-270-2092  
Fax: 601-933-3369

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[Katelan.Crain@ergon.com](mailto:Katelan.Crain@ergon.com)

Enclosure: Class II Administrative Update Application (original and two CD's)  
Check No. 844163

CC: Jack Azar – EWVI  
File (48-E-01-03- )



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
**DIVISION OF AIR QUALITY**

601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
(304) 926-0475  
[www.dep.wv.gov/daq](http://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 45CSR:30 (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: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> 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. <b>West Virginia Business Registration.</b> Is the applicant a resident of the State of West Virginia? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO - If YES, provide a copy of the <b>Certificate of Incorporation/Organization/Limited Partnership</b> (one page) including any name change amendments or other Business Registration Certificate as <b>Attachment A</b> . - If NO, provide a copy of the <b>Certificate of Authority/Authority of L.L.C./Registration</b> (one page) including any name change amendments or other Business Certificate as <b>Attachment A</b> .			
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 <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> 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 <b>constructed, modified, relocated, administratively updated</b> or <b>temporarily permitted</b> (e.g., coal preparation plant, primary crusher, etc.):  The facility is a petroleum refinery that is constructing a 2500 bbl Biodiesel Storage Tank.		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 45CSR:30 (Title V) permit numbers associated with this process (for existing facilities only): R13-2334Y R30-02900008-2015	

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

12A.

- For **Modifications, Administrative Updates** or **Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction** or **Relocation permits**, please provide directions to the *proposed new site location* from the nearest state road. Include a **MAP** as **Attachment B**.

Two (2) miles south of Newell, WV on State Route 2

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

13. Briefly describe the proposed change(s) at the facility:  
 EWWI is proposing the addition of a 2,500 bbl (105,000 gal) Biodiesel storage tank for blending with ULSD to transport via marine loading. Tank emissions are calculated using a maximum throughput of 1,300 bbl (54,600 gal) per day. The throughput limitations to marine loading will not require modification since the current limit is well above the maximum throughput of the new tank.

14A. Provide the date of anticipated installation or change: 10/01/2016 - If this is an <b>After-The-Fact</b> permit application, provide the date upon which the proposed change did happen: / /	14B. Date of anticipated Start-Up if a permit is granted: 12/1/2016
--	--

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).

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

16. Is demolition or physical renovation at an existing facility involved?     YES     NO

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](http://www.epa.gov/ceppo)), submit your **Risk Management Plan (RMP)** to U. S. EPA Region III.

18. **Regulatory Discussion.** List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (*if known*). 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 (*if known*). Provide this information as **Attachment D**.

**Section II. Additional attachments and supporting documents.**

19. Include a check payable to WVDEP – Division of Air Quality with the appropriate **application fee** (per 45CSR22 and 45CSR13).

20. Include a **Table of Contents** as the first page of your application package.

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**).  
 - Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).

22. Provide a **Detailed Process Flow Diagram(s)** showing each proposed or modified emissions unit, emission point and control device as **Attachment F**.

23. Provide a **Process Description** as **Attachment G**.  
 - Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.  
 – For chemical processes, provide a MSDS for each compound emitted to the air.

25. Fill out the **Emission Units Table** and provide it as **Attachment I**.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

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 checked="" 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.

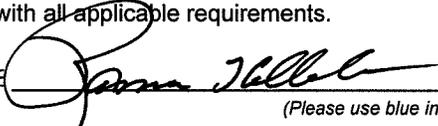
**Certification of Truth, Accuracy, and Completeness**

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 \_\_\_\_\_

  
(Please use blue ink)

DATE: \_\_\_\_\_

9/24/2016  
(Please use blue ink)

35B. Printed name of signee: Ramon L. Callahan, Jr.

35C. Title: Vice President – EHS

35D. E-mail: [Ray.Callahan@ergon.com](mailto:Ray.Callahan@ergon.com)

35E. Phone: 601-933-3000

35F. FAX: 601-933-3369

36A. Printed name of contact person (if different from above): Katelan Crain

36B. Title: Environmental Engineer

36C. E-mail: [Katelan.Crain@ergon.com](mailto:Katelan.Crain@ergon.com)

36D. Phone: 601-933-3122

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 checked="" 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 checked="" 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 checked="" type="checkbox"/> Attachment I: Emission Units Table               | <input checked="" type="checkbox"/> Attachment S: Title V Permit Revision Information   |
| <input checked="" 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.*

**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.**

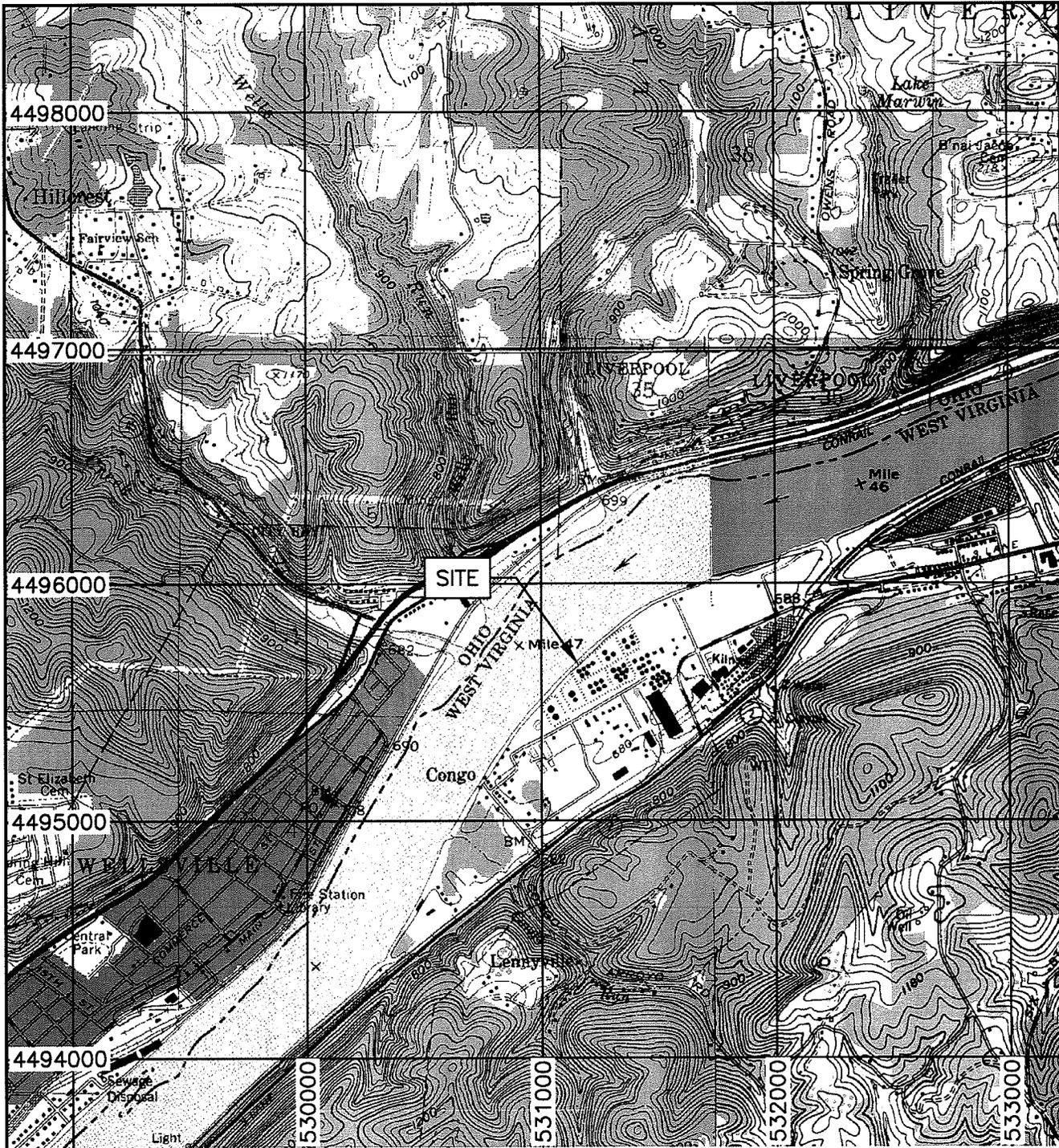
**This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.**

**Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.**

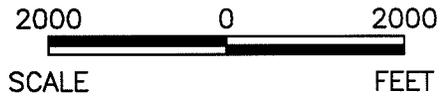
**TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.  
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of  
this certificate displayed at every job site within West Virginia.**

**ATTACHMENT B**

**LOCATION MAP**



SOURCE: 7.5 MINUTE USGS EAST  
 LIVERPOOL NORTH, EAST LIVERPOOL SOUTH,  
 WELLSVILLE, AND WEST POINT QUADRANGLES



**ENSAFE**

(800) 588-7962  
 MEMPHIS, TENNESSEE  
 ARKANSAS FLORIDA KENTUCKY MICHIGAN MISSISSIPPI  
 OHIO TENNESSEE TEXAS SOUTH CAROLINA  
 VIRGINIA SLOVAKIA

SITE LOCATION MAP  
 ERGON—WEST VIRGINIA, INC.  
 NEWELL REFINERY  
 NEWELL, WEST VIRGINIA

DWG DATE: 08/14/03 NAME: 3182103W002

**ATTACHMENT I**  
**EMISSIONS UNIT TABLE**



**ATTACHMENT J**  
**EMISSION POINTS DATA SUMMARY SHEET**

**Attachment J  
EMISSION POINTS DATA SUMMARY SHEET**

**Table 1: Emissions Data**

Emission Point ID No. (Must match Emission Units Table & Plot Plan)	Emission Point Type <sup>1</sup>	Emission Unit Vented Through This Point (Must match Emission Units Table & Plot Plan)		Air Pollution Control Device (Must match Emission Units Table & Plot Plan)		Vent Time for Emission Unit (chemical processes only)		All Regulated Pollutants - Chemical Name/CAS <sup>3</sup>  (Speciate VOCs & HAPS)	Maximum Potential Uncontrolled Emissions <sup>4</sup>		Maximum Potential Controlled Emissions <sup>5</sup>		Emission Form or Phase  (At exit conditions, Solid, Liquid or Gas/Vapor)	Est. Method Used <sup>6</sup>	Emission Concentration  (ppmv or mg/m <sup>3</sup> )
		ID No.	Source	ID No.	Device Type	Short Term <sup>2</sup>	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
TK-4067	Tank Vent	TK-4067	Tank 4067	N/A	N/A	N/A	N/A	VOC	---	0.091	---	---	Gas/Vapor	API Emission Factors	N/A

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

- <sup>1</sup> Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.
- <sup>2</sup> Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).
- <sup>3</sup> List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS<sub>2</sub>, VOCs, H<sub>2</sub>S, Inorganics, Lead, Organics, O<sub>3</sub>, NO, NO<sub>2</sub>, SO<sub>2</sub>, SO<sub>3</sub>, all applicable Greenhouse Gases (including CO<sub>2</sub> and methane), etc. DO NOT LIST H<sub>2</sub>, H<sub>2</sub>O, N<sub>2</sub>, O<sub>2</sub>, and Noble Gases.
- <sup>4</sup> Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- <sup>5</sup> Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- <sup>6</sup> Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).
- <sup>7</sup> Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m<sup>3</sup>) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO<sub>2</sub>, use units of ppmv (See 45CSR10).



**ATTACHMENT L**  
**EMISSIONS UNIT DATA SHEET**

**Attachment L**  
**EMISSIONS UNIT DATA SHEET**  
**STORAGE TANKS**

Provide the following information for each new or modified bulk liquid storage tank as shown on the *Equipment List Form* and other parts of this application. A tank is considered modified if the material to be stored in the tank is different from the existing stored liquid.

IF USING US EPA'S TANKS EMISSION ESTIMATION PROGRAM (AVAILABLE AT [www.epa.gov/tnn/tanks.html](http://www.epa.gov/tnn/tanks.html)), APPLICANT MAY ATTACH THE SUMMARY SHEETS IN LIEU OF COMPLETING SECTIONS III, IV, & V OF THIS FORM. HOWEVER, SECTIONS I, II, AND VI OF THIS FORM MUST BE COMPLETED. US EPA'S AP-42, SECTION 7.1, "ORGANIC LIQUID STORAGE TANKS," MAY ALSO BE USED TO ESTIMATE VOC AND HAP EMISSIONS (<http://www.epa.gov/tnn/chief/>).

**I. GENERAL INFORMATION (required)**

1. Bulk Storage Area Name	2. Tank Name 4067
3. Tank Equipment Identification No. (as assigned on <i>Equipment List Form</i> ) 4067	4. Emission Point Identification No. (as assigned on <i>Equipment List Form</i> ) TK-4067
5. Date of Commencement of Construction (for existing tanks)	
6. Type of change <input checked="" type="checkbox"/> New Construction <input type="checkbox"/> New Stored Material <input type="checkbox"/> Other Tank Modification	
7. Description of Tank Modification (if applicable) N/A	
7A. Does the tank have more than one mode of operation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (e.g. Is there more than one product stored in the tank?)	
7B. If YES, explain and identify which mode is covered by this application (Note: A separate form must be completed for each mode).	
7C. Provide any limitations on source operation affecting emissions, any work practice standards (e.g. production variation, etc.): throughput	

**II. TANK INFORMATION (required)**

8. Design Capacity (specify barrels or gallons). Use the internal cross-sectional area multiplied by internal height. 105,000 gallons	
9A. Tank Internal Diameter (ft) 22'	9B. Tank Internal Height (or Length) (ft) 48'
10A. Maximum Liquid Height (ft) 43.2	10B. Average Liquid Height (ft) 24
11A. Maximum Vapor Space Height (ft) N/A	11B. Average Vapor Space Height (ft) N/A
12. Nominal Capacity (specify barrels or gallons). This is also known as "working volume" and considers design liquid levels and overflow valve heights.	

13A. Maximum annual throughput (gal/yr) 19,929,000	13B. Maximum daily throughput (gal/day) 54,600
14. Number of Turnovers per year (annual net throughput/maximum tank liquid volume)	
15. Maximum tank fill rate (gal/min) TBD	
16. Tank fill method <input type="checkbox"/> Submerged <input type="checkbox"/> Splash <input checked="" type="checkbox"/> Bottom Loading	
17. Complete 17A and 17B for Variable Vapor Space Tank Systems <input checked="" type="checkbox"/> Does Not Apply	
17A. Volume Expansion Capacity of System (gal)	17B. Number of transfers into system per year
18. Type of tank (check all that apply): <input checked="" type="checkbox"/> Fixed Roof X vertical ___ horizontal ___ flat roof X cone roof ___ dome roof ___ other (describe) <input type="checkbox"/> External Floating Roof ___ pontoon roof ___ double deck roof <input type="checkbox"/> Domed External (or Covered) Floating Roof <input type="checkbox"/> Internal Floating Roof ___ vertical column support ___ self-supporting <input type="checkbox"/> Variable Vapor Space ___ lifter roof ___ diaphragm <input type="checkbox"/> Pressurized ___ spherical ___ cylindrical <input type="checkbox"/> Underground <input type="checkbox"/> Other (describe)	

### III. TANK CONSTRUCTION & OPERATION INFORMATION (optional if providing TANKS Summary Sheets)

19. Tank Shell Construction: <input type="checkbox"/> Riveted <input type="checkbox"/> Gunitite lined <input type="checkbox"/> Epoxy-coated rivets <input type="checkbox"/> Other (describe)		
20A. Shell Color White	20B. Roof Color White	20C. Year Last Painted N/A
21. Shell Condition (if metal and unlined): <input type="checkbox"/> No Rust <input type="checkbox"/> Light Rust <input type="checkbox"/> Dense Rust <input checked="" type="checkbox"/> Not applicable		
22A. Is the tank heated? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
22B. If YES, provide the operating temperature (°F)		
22C. If YES, please describe how heat is provided to tank.		
23. Operating Pressure Range (psig): -0.03 to 0.03		
24. Complete the following section for <b>Vertical Fixed Roof Tanks</b>		<input type="checkbox"/> Does Not Apply
24A. For dome roof, provide roof radius (ft)		
24B. For cone roof, provide slope (ft/ft) 0.33		
25. Complete the following section for <b>Floating Roof Tanks</b>		<input checked="" type="checkbox"/> Does Not Apply
25A. Year Internal Floaters Installed:		
25B. Primary Seal Type: <input type="checkbox"/> Metallic (Mechanical) Shoe Seal <input type="checkbox"/> Liquid Mounted Resilient Seal (check one) <input type="checkbox"/> Vapor Mounted Resilient Seal <input type="checkbox"/> Other (describe):		
25C. Is the Floating Roof equipped with a Secondary Seal? <input type="checkbox"/> YES <input type="checkbox"/> NO		
25D. If YES, how is the secondary seal mounted? (check one) <input type="checkbox"/> Shoe <input type="checkbox"/> Rim <input type="checkbox"/> Other (describe):		
25E. Is the Floating Roof equipped with a weather shield? <input type="checkbox"/> YES <input type="checkbox"/> NO		

25F. Describe deck fittings; indicate the number of each type of fitting:		
ACCESS HATCH		
BOLT COVER, GASKETED:	UNBOLTED COVER, GASKETED:	UNBOLTED COVER, UNGASKETED:
AUTOMATIC GAUGE FLOAT WELL		
BOLT COVER, GASKETED:	UNBOLTED COVER, GASKETED:	UNBOLTED COVER, UNGASKETED:
COLUMN WELL		
BUILT-UP COLUMN - SLIDING COVER, GASKETED:	BUILT-UP COLUMN - SLIDING COVER, UNGASKETED:	PIPE COLUMN - FLEXIBLE FABRIC SLEEVE SEAL:
LADDER WELL		
PIPE COLUMN - SLIDING COVER, GASKETED:	PIPE COLUMN - SLIDING COVER, UNGASKETED:	
GAUGE-HATCH/SAMPLE PORT		
SLIDING COVER, GASKETED:	SLIDING COVER, UNGASKETED:	
ROOF LEG OR HANGER WELL		
WEIGHTED MECHANICAL ACTUATION, GASKETED:	WEIGHTED MECHANICAL ACTUATION, UNGASKETED:	SAMPLE WELL-SLIT FABRIC SEAL (10% OPEN AREA)
VACUUM BREAKER		
WEIGHTED MECHANICAL ACTUATION, GASKETED:	WEIGHTED MECHANICAL ACTUATION, UNGASKETED:	
RIM VENT		
WEIGHTED MECHANICAL ACTUATION GASKETED:	WEIGHTED MECHANICAL ACTUATION, UNGASKETED:	
DECK DRAIN (3-INCH DIAMETER)		
OPEN:	90% CLOSED:	
STUB DRAIN		
1-INCH DIAMETER:		
OTHER (DESCRIBE, ATTACH ADDITIONAL PAGES IF NECESSARY)		

26. Complete the following section for Internal Floating Roof Tanks <input checked="" type="checkbox"/> Does Not Apply	
26A. Deck Type: <input type="checkbox"/> Bolted <input type="checkbox"/> Welded	
26B. For Bolted decks, provide deck construction:	
26C. Deck seam: <input type="checkbox"/> Continuous sheet construction 5 feet wide <input type="checkbox"/> Continuous sheet construction 6 feet wide <input type="checkbox"/> Continuous sheet construction 7 feet wide <input type="checkbox"/> Continuous sheet construction 5 × 7.5 feet wide <input type="checkbox"/> Continuous sheet construction 5 × 12 feet wide <input type="checkbox"/> Other (describe)	
26D. Deck seam length (ft)	26E. Area of deck (ft <sup>2</sup> )
For column supported tanks:	26G. Diameter of each column:
26F. Number of columns:	

**IV. SITE INFORMATION** (optional if providing TANKS Summary Sheets)

27. Provide the city and state on which the data in this section are based. Pittsburgh, PA	
28. Daily Average Ambient Temperature (°F)	
29. Annual Average Maximum Temperature (°F)	
30. Annual Average Minimum Temperature (°F)	
31. Average Wind Speed (miles/hr)	
32. Annual Average Solar Insulation Factor (BTU/(ft <sup>2</sup> ·day))	
33. Atmospheric Pressure (psia)	14.11

**V. LIQUID INFORMATION** (optional if providing TANKS Summary Sheets)

34. Average daily temperature range of bulk liquid:			
34A. Minimum (°F)	47.06	34B. Maximum (°F)	56.81
35. Average operating pressure range of tank:			
35A. Minimum (psig)	0.0054	35B. Maximum (psig)	0.0077
36A. Minimum Liquid Surface Temperature (°F)	47.06	36B. Corresponding Vapor Pressure (psia)	0.0054
37A. Average Liquid Surface Temperature (°F)	51.94	37B. Corresponding Vapor Pressure (psia)	0.0065
38A. Maximum Liquid Surface Temperature (°F)	56.81	38B. Corresponding Vapor Pressure (psia)	0.0077
39. Provide the following for <u>each</u> liquid or gas to be stored in tank. Add additional pages if necessary.			
39A. Material Name or Composition	Jet Kerosene		
39B. CAS Number			
39C. Liquid Density (lb/gal)			
39D. Liquid Molecular Weight (lb/lb-mole)			
39E. Vapor Molecular Weight (lb/lb-mole)	130.00		



**ATTACHMENT N**  
**SUPPORTING EMISSIONS CALCULATIONS**

EWVI is proposing to install a 105,000-gallon fixed-roof biodiesel tank (Emission Point ID TK-4067) at the site. The biodiesel will be blended into the Ultra-Low Sulfur Diesel (ULSD) fuel that is produced at the facility, in the range of 2 to 10 percent. Emissions from this tank are estimated using API emission factors. The profile for 'Jet Kerosene' is used to calculate emissions from this tank, based on the fact that the emissions calculations for the existing heavy product tanks at EWVI are estimated using content of jet kerosene. Biodiesel has a very low vapor pressure, and therefore, minimal emissions are expected from the proposed tank. Output files from API Emissions Data are included immediately after this section of the application.

**EWVI - Emissions Report - Tanks - Total Emissions VOC (1)**  
 Total Tank VOC emissions with throughput not broken out by tank type

Compound	Units	Unit	Volatile Organic Compounds												Total
			January	February	March	April	May	June	July	August	September	October	November	December	
Newell, WV - EWVI	Newell EWVI VFR Tank 4067 - Real	lb Pollutant Tons	6.218 0.003	6.868 0.003	8.912 0.004	11.26 0.006	14.27 0.007	17.173 0.009	19.147 0.01	20.366 0.01	19.991 0.01	18.627 0.009	18.333 0.009	20.065 0.01	181.231 0.091

This Report has been generated on Tue, 08/30/16 08:33:22 am by Katelyn Crain.

Search Criteria  
 Organization  
 Sub Scenario  
 Parameter  
 Frequency

Part of Newell, WV - EWVI  
 = Tank 4067 PTE  
 = Monthly VFR Tank Throughput  
 = Monthly

**ATTACHMENT S**

**TITLE V PERMIT REVISION INFORMATION**

## Attachment S

### Title V Permit Revision Information

<b>1. New Applicable Requirements Summary</b>	
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) <sup>(1)</sup>
<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program EGUs (45CSR26)
<p><sup>(1)</sup> If this box is checked, please include <b>Compliance Assurance Monitoring (CAM) Form(s)</b> for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why <b>Compliance Assurance Monitoring</b> is not applicable:</p>   	

<b>2. Non Applicability Determinations</b>
<p>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.</p>     
<input type="checkbox"/> <b>Permit Shield Requested</b> <i>(not applicable to Minor Modifications)</i>

*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.

**Will need to add emission unit: Tank TK-4067; Fixed roof biodiesel tank**

### 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
R13-2334Y	01/08/2016	
	/ /	
	/ /	

### 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
NOx	0.00
CO	0.00
VOC	+0.091
SO2	0.00
PM	0.00

*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):  _____ (Please use blue ink)	Date: <u>09 / 26 / 2010</u> _____ (Please use blue ink)
Named (typed): Ramon L. Callahan, Jr.	Title: Vice President – EHS

**Note: Please check if the following included (if applicable):**

- |                          |   |
|--------------------------|---|
| <input type="checkbox"/> | Compliance Assurance Monitoring Form(s) |
| <input type="checkbox"/> | 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**