



Id. No. 039-00662 Reg. PD15-062
Company DeNovo Constructors, Inc.
Facility Spring Hill Region 4
Initials TEM

west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Phone: 304/926-0475 • Fax: 304/926-0479

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

MEMORANDUM

To: Beverly D. McKeone
From: Thornton E. Martin Jr., Permit Engineer
Date: August 28, 2015
Subject: PD15-062

On August 07, 2015, DeNovo Constructors, Inc. ("DeNovo") submitted a request for a permit determination regarding the use of a portable TESAB 1012TS jaw crusher in the demolition of the remaining concrete pads and foundations at the former FMC Spring Hill Peroxide Plant in South Charleston, Kanawha County, West Virginia. The portable jaw crusher utilizes a 2011, Caterpillar C13, 350 BHP, diesel-powered, Tier III certified engine for power and pump operation. DeNovo states that the total estimated tonnage of material is 7,000 tons and estimates 80 hours of operation to complete the project. The unit will process approximately 100 TPH (limited by screen capacity) of 2 inch minus material. After the material is crushed, it will remain on site and be re-used to backfill excavations and provide a 4 inch cover.

A portable TESAB 1012TS jaw crusher operating at 100 TPH would not be subject to the provisions of 40CFR60 Subpart OOO :

§60.670 Applicability and designation of affected facility.

(c) Facilities at the following plants are not subject to the provisions of this subpart:
(2) Portable sand and gravel plants and crushed stone plants with capacities, as defined in §60.671, of 136 megagrams per hour (150 tons per hour) or less;

The potential to emit (PTE) as defined under 45CSR13 states :

2.19. "Potential to emit" means the maximum design capacity of a stationary source or emissions unit to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source or emissions unit to emit a pollutant, including air pollution control equipment and restrictions on hours

Entire Document
NON-CONFIDENTIAL

of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable by the Secretary and U. S. EPA in any permit or consent order. Secondary emissions shall not be included in any determination of a stationary sources potential to emit.

In other words, the PTE is based on operation of the facility at its' rated capacity of 100 TPH for 8,760 hours (1 Year) with no controls in place to limit emissions.

Based on the information provided, particulate matter (PM) emissions will be 2.90 pounds per hour (lb/hr) and 12.7 tons per year (TPY) for a single crusher and two (2) transfer points (not including the engine) operating at 100 TPH for 8,760 hours with no controls.

The diesel engine is EPA, tier III certified and emissions will be 2.45 lb/hr and 10.74 TPY of Nitrogen Oxides (NO_x), 1.80 lb/hr and 7.88 TPY of Carbon Monoxide (CO), 0.30 lb/hr and 1.31 TPY of Sulfur Dioxide (SO₂) and 0.32 lb/hr and 1.40 TPY of Particulate Matter less than 10 microns (PM₁₀) for 8,760 hours of operation with no controls.

Since this portable crusher will operate at less than 150 TPH and emissions are less than 6 lb/hr and 10 TPY for any regulated air pollutant, the writer believes that no permit is required.