west virginia department of environmental protection

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Earl Ray Tomblin, Governor
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MEMORANDUM

To: Beverly McKeone

From: Thornton E. Martin Jr.

Date: September 09, 2016

Subject: Ashland Inc. – Neal Facility – Wayne County, WV

ID #: 099-00009

APP #: R13-3297T Extension Request

BACKGROUND INFORMATION:

On August 31, 2016, Ashland, Inc. submitted a request for a permit extension regarding their Temporary Permit for 40 Portable Diesel Fuel Fired Air Compressors to serve as primary supply of compressed air, a raw material in the production of maleic anhydride, in the event that one of the two existing electric air compressors experience an extended down-time for maintenance or repairs.

Ashland Inc. states that due to the age of the existing electric air compressor units, there is some concern that the plant could possibly require an alternate supply of compressed air at some point during the year. At this time, it is not known if or when these units will need to be installed. However, this extension is being submitted so that the necessary permitting will be in place should the situation arise when the plant needs to install these portable units in order to continue operating. Ashland Inc. will contact West Virginia Department of Environmental Protection (WVDEP) of their intent to bring in the units prior to commencing mobilization of the units.

Under 45 CSR 13:

§45-13-11. Temporary Construction or Modification Permits.

11.1. Upon written request by an owner or operator of a source, the Secretary may allow the owner or operator to make limited changes for experimental, testing, commercial development and other temporary purposes for limited periods of time without applying for a construction permit or permit modification otherwise required under the provisions of this rule

for such activity. If granted, the temporary permit shall indicate the nature of the activity being approved, the time period for which the approval is being granted, and any conditions to be imposed on the approved activity.

11.2. To permit experimental, testing, commercial development and other temporary purposes, the Secretary may issue temporary permits for periods up to six (6) months (which may be extended in writing for up to twelve (12) additional months at the Secretary's discretion) upon the submission of a written application for such extension to the Secretary by the owner or operator. The Secretary may impose any reasonable conditions as part of a temporary permit which may include, but not be limited to, the submission of periodic progress or operation reports, the provision of suitable sampling sites for tests, emissions testing by the permittee, and the installation, operation, and maintenance of air pollutant monitoring devices.