

# Fact Sheet



## For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on August 11, 2015.

Permit Number: **R30-05300007-2015**  
Application Received: **September 10, 2015**  
Plant Identification Number: **05300007**  
Permittee: **ICL-IP America Inc.**  
Facility Name: **Gallipolis Ferry Plant**  
Mailing Address: **State Route 2, P.O. Box 1721**  
**Gallipolis Ferry, WV 25515**

Permit Action Number: *MM01*      Revised: *April 13, 2016*

---

Physical Location:	Gallipolis Ferry, Mason County, West Virginia
UTM Coordinates:	396.5 km Easting • 4,292.30 km Northing • Zone 17
Directions:	From Point Pleasant, drive 6 miles south on Rt. 2. The facility is on the right.

---

### Facility Description

Facility manufactures Aryl and Alkyl Phosphate Esters and other Specialty Chemicals.

SIC Codes: 2869; 2819; 2899

This minor modification is based on recently issued permits R13-2438R and R13-2438S. The R13-2438R permit covers the replacement of a 190 HP diesel emergency firewater pump with a 237 HP diesel emergency firewater pump (Emission Unit ID P-434). The new emergency firewater pump is EPA compliant/certified to meet the requirements of 40 C.F.R. 60 Subpart IIII.

The R13-2438S permit (Administrative Amendment) was issued soon after the R13-2438R to make some minor corrections.

## Emissions Summary

As the result of this modification, facility-wide PTE will change as follows based on 500 hrs/year of operation for the new engine (Emission Unit ID P-434):

Regulated Pollutants	Change in Potential Emissions, TPY
Carbon Monoxide (CO)	- 0.11
Nitrogen Oxides (NO <sub>x</sub> )	- 0.72
Sulfur Dioxide (SO <sub>2</sub> )	+ 0.05
Particulate Matter (PM <sub>2.5</sub> )	- 0.07
Particulate Matter (PM <sub>10</sub> )	- 0.07
Volatile Organic Compounds (VOC)	-0.08
HAPs	+ 0.03

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 173.14 TPY of NO<sub>x</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, ICL-IP America is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This modification has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Pre-construction Permits
	45CSR16	NSPS
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40 CFR Part 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
	40 CFR 63 Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
State Only:	N/A	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2438S	03/16/2016	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

**Determinations and Justifications**

The following changes were included in this Title V minor modification:

1. Emission Units Table 1.1 – 190 HP emergency diesel firewater pump (Emission Unit ID P-434) was replaced with a 237 HP emergency diesel firewater pump.
2. 40 C.F.R. 60, Subpart IIII “Standards of Performance for Stationary Compression Ignition Internal Combustion Engines” is applicable to the new emergency diesel firewater pump:

Engine	Design Capacity	Ignition	Type/Use	Year installed	Source of HAP emissions
P-434	237 HP	Compression (CI)	Emergency	2015 (new)	Area source

The engine is subject to Subpart IIII because it is a stationary CI ICE that commenced construction after July 11, 2005 per 60.4200(a)(4).

The new emergency firewater pump is EPA compliant/certified to meet the requirements of 40 C.F.R. 60 Subpart IIII, therefore it is not subject to an initial performance test. The engine will be limited to 100 hrs/year of non-emergency operation and 500 hrs/year of total operation. The following requirements were added to Section 4.0 of the permit: 4.1.18.7 through 4.1.18.14, 4.2.10 and 4.3.4.

3. 40 C.F.R. 63, Subpart ZZZZ “National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines” is applicable to the new emergency engine P-434 at an area source of HAP emissions constructed on or after June 12, 2006 (per §63.6590(a)(2)(iii)). Per §63.6590(c)(1), for the engines located at an area source of HAP emissions, they “must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII” (requirement 5.1.1 was revised to add this provision). Requirements from 40 C.F.R. 60, Subpart IIII for the new engine are included in the permit under Section 4.0 (see item (2) above). Section 5.0 was revised to remove reference to old engine “P-434” which was subject to the 40 CFR 63 Subpart ZZZZ requirements for existing emergency CI RICE.

4. Requirement 4.1.18.3 – in this R13-2438R based requirement a typo was corrected in a footnote (2): the reference supposed to be made to “Section 4.1.18.7” instead of “Section 4.1.18.8”. This typo was corrected in the R13-2438S.
5. Requirement 4.1.18.11 – in this R13-2438R based requirement a typo was corrected – double paragraph sign in front of “60.4205” was changed to a single paragraph sign. This typo was corrected in the R13-2438S.
6. Requirements 4.1.18.10 and 4.2.11 (40 C.F.R. Part 60 Subpart III conditions §60.4209(b) and §60.4214(c)) were found not applicable to the new firewater pump P-434. The engine does not include a diesel particulate filter and is certified without treatment devices, therefore a back pressure monitor is not required. These requirements were removed from the R13-2438R (via administrative amendment R13-2438S requested by the company) and from this permit.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

N/A

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date:	Not Applicable for minor modifications
Ending Date:	N/A

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Natalya V. Chertkovsky-Veselova  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478  
[natalya.v.chertkovsky@wv.gov](mailto:natalya.v.chertkovsky@wv.gov)

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

During the EPA 45-day review period the R13-2438S permit (an administrative amendment of the recently issued permit R13-2438R) was issued per the company's request to make some minor corrections (including removal of requirements 4.1.18.10 and 4.2.11). These changes were also incorporated into this permit modification (see items 4-6 of the Determinations and Justifications section above for more information).