



October 11, 2017

Beverly D. McKeone
Division of Air Quality
West Virginia Department of Environmental Protection
601 57th Street, SE
Charleston, WV 25304

**Subject: Allmine Paving, LLC. - Inwood WV Facility (003-00137)
Class I Administrative Amendment to Permit No. R13-2828E**

Dear Ms. McKeone:

Allmine Paving, LLC (Allmine) currently operates its Inwood, West Virginia Facility in accordance with air Permit No. R13-2828E as issued on November 25, 2014. The permit application associated with the permit, included the installation/operation of three (3) "Processed Asphalt Storage Tanks" (EU 4S) to accommodate the asphalt materials. Emissions from the Processed Asphalt Storage Tanks are captured via an active closed vent system and are routed to one of two direct fired thermal oxidizers (DFTO1 or DFTO2).

Although the facility was permitted to install three Processed Asphalt Storage Tanks, (Attachment 1) only two of the Processed Asphalt Storage Tanks were actually installed during 2010. Note that as shown in Attachment 1, **Table 1.0 Emission Units** in Permit No. R13-2828E references that all three tanks were listed as installed during 2010. Attachment 2 is a corrected version of Table 1.0 and that should replace the current version of Table 1.

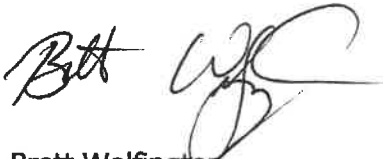
However, as discussed with Jerry Williams previously, Allmine now plans on installing the third tank permitted by Table 1. Note however, rather than installing a 26' diameter by 30' tall 119,156 gallon Processed Asphalt Storage Tank as listed in Table 1, TAMKO desires to install a 26' diameter by 40' tall 158,856 gallon Processed Asphalt Storage Tank. This proposed tank has been added to the modified Table 1 presented in Attachment 2.

The change in tank dimensions will not increase the maximum production rate of the facility which is currently based on the capacity of the blowstill operation and a 420,200 ton Processed Asphalt Storage Tanks throughput limit. Additionally, the change in tank dimensions will not increase the rate of material transfer into or out of the Processed Asphalt Storage Tanks. Emissions from Processed Asphalt Storage Tanks equipped with an active closed vent system and control device are determined on a mass throughput basis (i.e., pounds of emissions per ton of asphalt produced). This differs from uncontrolled tank emissions methodologies based on working and breathing losses.

Thus, there will be no increase in asphalt production, altering the dimensions of the third tank will not affect the potential emissions from asphalt storage or the facility's total potential emissions. The proposed change will not affect the facility's status as a minor source with respect to the Title V and as a minor source with respect to New Source Review. Therefore, Allmine is not requesting a change to the DFTO emissions limitations in Permit No. R13-2828E and as discussed with Jerry Williams, believes that the change in tank dimensions can be done under a Class 1 Permit Amendment.

Thank you for your assistance with this matter. Please contact Bob Hockman at 417-624-6644 X 2375, if you have any questions regarding this submittal.

Respectfully,
For, Allmine Paving, LLC. by

A handwritten signature in black ink, appearing to read 'Brett Wolfington', is written over a faint, larger signature.

Brett Wolfington
General Manager

CC. Jerry Williams, WVDEP
Bob Hockman
Sandra Potter