

Emissions Summary

There are no changes in permitted emissions associated with this Minor Modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility (combined with Union Carbide Corporation 03900005) maintains the potential to emit over 100 TPY of CO, NO_x, and VOC's, as well as over 10 TPY of a single HAP and 25 TPY of total HAP's. Due to the facility-wide potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Specialty Products US, LLC 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13 45CSR30	Preconstruction permits for minor sources. Operating permit requirement.
State Only:	45CSR§§21-37 and 40 45CSR27	Control of VOC Emissions Best Available Technology (BAT) for HAPs

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

The following Permits/Consent Orders are affected by this modification:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-3404	09-28-2018	

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

Minor Modification MM01 makes the following changes:

Specialty Products US, LLC (03900682) obtained ownership of this Group 5 of 8 Permit from Union Carbide Corporation (03900005) on November 26, 2018. The Facility ID, Group Number, mailing address, phone number, and name of Owner have been updated in this Permit. CELLOSIZETM plant is shut down and removed from the facility description on Page 1 of the Permit.

R13-3404 was issued to incorporate and supersede the specific requirements for these units of Rule 21, Section 40 Consent Order CO-R21-97-41 for reducing emissions of volatile organic compounds (VOCs) and Rule 27 Consent Order R27-99-14-A(92) for controlling emissions of toxic air pollutants (TAPs). Additionally, there will be a change in the vent point for three tanks (T4905, T4906, and T4907) from that listed in the Rule 21 Consent Order. There will be no change in the amount of VOCs authorized to be emitted to the air (48 lbs/hr, 1.8 tons/yr).

- 1) The Emission Point ID's and Control Devices listed in the Section 1.0 Equipment Table and Attachment A of Appendix A have been revised for Tanks T4905, T4906, and T4907. Additionally, Equipment ID Numbers have been added to Attachment A and Tanks 4905, 4906, and 4907 have been combined to one Emission Point. Finally, the footnotes in Attachment A have been deleted and two notes about venting have been added as a result of changes from the R13-3404 Permit.
- 2) In the Table of Contents, and Attachments A and B, the term "Consent Order CO-R21-97-41 Attachments A and B" has been replaced with "Rule 21 Equipment with Maximum Theoretical VOC Emissions \geq 6 lbs/hr".
- 3) R13-3404 has been added to the list of Section 1.2 Active R13 Permits.
- 4) The citations for Conditions 3.5.10, 3.5.11, 5.1.5, 5.1.12 have been changed to remove references to the Rule 21 and Rule 27 Consent Orders and add the specific R13-3404 Permit Conditions.
- 5) Previous Condition 5.1.12.1 has been revised to remove the Rule 21 Consent Order language regarding the alternative emissions reduction plan (AERP) and to replace it with the requirements of R13-3404 Condition 4.1.1.
- 6) Previous Conditions 5.1.12.2 and 5.1.12.3 have been revised to remove the Rule 21 Consent Order language regarding the operation and maintenance of air pollution control equipment and to replace it with the requirements of R13-3404 Condition 4.1.3.
- 7) Previous Condition 5.1.13 has been revised to remove the Rule 21 Consent Order requirements regarding Equipment Leaks and to replace them with the requirements of R13-3404 Condition 4.1.2.
- 8) Previous Condition 5.1.14 has been revised to change the citation of the source of the emission limits from the Rule 27 Consent Order to Conditions 4.1.6 and 4.1.8 of R13-3404. Units that no longer have EO emissions at the facility have been removed from Table 5.1.14.
- 9) The reference to the Rule 21 Consent Order in Condition 5.1.15 has been removed.
- 10) Condition 5.3.1 has been updated to include a citation for Condition 4.1.9 of R13-3404.
- 11) Condition 5.3.5 has been revised to require compliance with the Appendix A emission limits as well as the testing and monitoring required by 45CSR21 in order to show compliance with those limits.
- 12) References to the Rule 21 Consent Order have been removed from Conditions 5.3.6, 5.4.9, and 5.5.6.
- 13) Emission Point 230II has been removed from Condition 5.4.11 as it no longer exists.
- 14) Previous Appendix A: Attachment B which had Rule 21 Consent Order requirements for excess emission logs has been removed.

Non-Applicability Determinations

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

None.

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: N/A
Ending Date: N/A

Point of Contact

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

Mike Egnor
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Division of Air Quality
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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)

Updated EPA address in Condition 3.5.3 after proposed permit was sent to EPA for review.