

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 April 26, 2022.

Permit Number: **R30-05300054-2022**
Application Received: **May 22, 2023**
Plant Identification Number: **03-54-05300054**
Permittee: **APG Polytech, LLC**
Facility Name: **Apple Grove Plant**
Mailing Address: **State Rte. 2 Apple Grove, WV 25502-0088**

Permit Action Number: *MM01* Revised: *January 8, 2024*

Physical Location: Apple Grove, Mason County, West Virginia
UTM Coordinates: 397.86 km Easting • 4,279.97 km Northing • Zone 17
Directions: WV Route 2, approximately thirteen miles south of Point Pleasant and thirty miles north of Huntington, WV.

Facility Description

APG Polytech, LLC manufactures polyester resin and handles the final product in bagging/packaging, storage, and loading facilities. Infrastructure and support facilities are also located at the site and include boilers, wastewater treatment, warehouses, maintenance shops, and laboratories. SIC code: 2821.

Emissions Summary

This modification results in the following emission changes:

- Increase of 2.28 tons per year of NO_x
- Increase of 0.35 tons per year of PM/PM₁₀/PM_{2.5}.
- Increase of 3.83 tons per year of CO.
- Increase of 0.35 tons per year of VOCs
- Increase of 0.03 tons per year of SO₂
- Increase of <0.01 tons per year of 1,4 Dioxane
- Increase of 0.06 tons per year of Acetaldehyde
- Increase of 0.07 tons per year of HAPs

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 26.19 tpy of Ethylene Glycol and 38.03 tpy of aggregate HAPs. Due to this facility's potential to emit over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, APG Polytech, 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:	45CSR2	Particulate matter and opacity limits for indirect heat exchangers.
	45CSR6	Control Air Pollution From Combustion of Refuse
	45CSR10	Control Air Pollution From Emission of Sulfur Oxides
	45CSR13	Permits for construction, modification, relocation and operations of stationary sources
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR 60
	45CSR30	Operating permit requirement.
	40CFR60 Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.
State Only:	None	

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 active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1650V	September 21, 2023	

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

This minor modification is for the installation of a Direct Fire Thermal Oxidizer/Waste Heat Steam Boiler (DFTO-1C/WHSB-1S) to treat air emissions from a new Organic Steam Stripping Column (OSC-1S). These changes were approved under R13-1650V and result in the following changes to the Title V permit:

OSC-1S Organic Steam Stripping Column was added to section 1.1 Emission Units table. The emissions from OSC-1S are controlled by the Direct Fire Thermal Oxidizer/Waste Heat Steam Boiler, DFTO-1C/WHSB-1S.

DFTO-1C/WHSB-1S Direct Fire Thermal Oxidizer/Waste Heat Boiler was added to section 1.1 Emission Units table.

The DFTO-1C/WHSB-1S Direct Fire Thermal Oxidizer/Waste Heat Steam Boiler is subject to 45CSR2, 45CSR6 for incinerators, 45CSR10, 40 CFR 60 Subpart Dc, and subject to the following emission limits which were added to Section 4.1.11.b.

Emission Point ID	Control Device	Emission Unit ID	Emissions		
			Pollutants	Hourly (pounds/hr)	Annual (tons/year)
4P-1800	Direct Fire Thermal Oxidizer	DFTO-1C	VOC	0.08	0.35
			NO _x	0.52	2.28
			CO	0.88	3.83
			PM ₁₀	0.08	0.35
			SO ₂	0.01	0.03
			Acetaldehyde	0.01	0.06

Compliance with the less stringent 45CSR§2-4.1.b hourly PM emission limits and the less stringent 45CSR§10-3.3.f hourly SO₂ emission limits was streamlined with the more stringent hourly PM and SO₂ emission limits in Section 4.1.11.b. 4P-1800 was listed with the emission points subject to the 45CSR2 requirements in section 4.1.12, 4.1.13, and 4.1.14.

Compliance with the hourly PM emission limit from 45CSR§6-4.1 was streamlined with the more stringent hourly PM emission limit in Section 4.1.11.b. Opacity requirements from 45CSR6 were included as Section 4.1.26 with visible emissions checks to demonstrate compliance added as Section 4.2.8.

Compliance with the emission limits in Section 4.1.11.b will be demonstrated by operating DFTO-1C/WHSB-1S in accordance with the operating limitations specified in Section 4.1.25, continuous monitoring as specified in 4.2.7, and testing as specified in 4.3.9.

The waste heat boiler is subject to 40 CFR 60 Dc. Natural gas usage recordkeeping requirements of this subpart were added as section 4.4.19 and streamlined with the recordkeeping requirements of 45CSR§2-8.3.c and 45CSR§2A-7.1.a.1.

Additional changes made to the Title V permit include changes to Title V boilerplate conditions 2.1.3, 2.11.4, 2.17, 2.22.1, 3.5.3, 3.5.4, 3.5.7, 3.5.8.a.1, and 3.5.8.a.2.

Non-Applicability Determinations

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

40CFR63 Subpart DDDDD is not applicable since waste heat boilers (WHB) are excluded from the definition of boiler in this subpart and this WHB is not a process heater because it produces steam.

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:

Jonathan Carney
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41247
Jonathan.W.Carney@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)

Not applicable.