

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 May 16, 2017.

Permit Number: **R30-03900682-2017**
Application Received: **December 11, 2018 (MM01)**
Plant Identification Number: **03-54-03900682**
Permittee: **Specialty Products US, LLC**
Facility Name: **Institute Facility**
Business Unit: **Glutaraldehyde Plant (Group 1 of 2)**
Mailing Address: **P.O. Box 1006 Institute WV 25112**

Permit Action Number: *MM01* Revised: *October 22, 2019*

Physical Location: Institute, Kanawha County, West Virginia
UTM Coordinates: 432.189 km Easting • 4,248.754 km Northing • Zone 17
Directions: From I-64, take the Institute exit, turn right onto State Route 25. Plant
 entrance is located about 1/4 mile west on Route 25.

Facility Description

Group 1 of 2 is the Glutaraldehyde Process Unit. Glutaraldehyde is produced by a reaction of methoxydihydropyran (MDP) with water in a reaction system. The reaction system effluent is pressured to a recovery system where glutaraldehyde is separated from methanol, a co-product of the reaction. Methanol and glutaraldehyde are recovered from the refining system. The glutaraldehyde is processed into different grades in blend tanks. Various grades of glutaraldehyde are shipped via tank truck, tote tanks, drums, and other small containers.

Specialty Products US, LLC (03900682) obtained ownership of this Group 4 of 8 Permit from Union Carbide Corporation (03900005) on November 26, 2018.

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, Specialty Products US, LLC will maintain the potential to emit over 100 TPY of VOC's. Due to the facility-wide potential to emit over 100 tons per year of criteria pollutants, 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	Control of VOC Emissions

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>)
R13-3412	10-29-2018	

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 4 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.

R13-3412 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).

- 1) The Emission Point ID's and Control Devices listed in the Section 1.0 Equipment Table have been revised. The ability for Emission Units A170 and B170 to not vent to the flare has been removed. The Tank Truck Wagon was listed twice as L6TT and TTWR. The second listing has been removed.
- 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) R13-3412 has been added to the list of Section 1.2 Active R13 Permits.
- 4) The citations for Conditions 3.5.10, 3.5.11, 4.4.13, and 4.5.11 have been changed to remove references to the Rule 21 Consent Order and add the specific R13-3412 Permit citations. Condition 3.4.1 has been revised to include the R13-3412 Permit citation.
- 5) Condition 4.1.7 has been revised to remove the Rule 21 Consent Order language regarding the alternative emissions reduction plan (AERP) and to replace it with the emission requirements of R13-3412 Condition 4.1.2 and the operation and maintenance requirements of R13-3412 Condition 4.1.8.
- 6) Condition 4.1.8 has been revised to remove the Rule 21 Consent Order requirements regarding Equipment Leaks and to replace them with the requirements of R13-3412 Condition 4.1.3.
- 7) Condition 4.3.2 has been revised to remove the Consent Order requirements for test methods and include the R13-3412 Conditions 4.1.5 and 4.3.1 which involve Rule 21 Testing Requirements. Condition 4.3.3 has been removed because it was combined with Condition 4.1.8.
- 8) New Conditions 4.4.15 and 4.4.16 have been added to incorporate the recordkeeping requirements for maintenance and malfunction of air pollution control equipment given in R13-3412 Conditions 4.4.2 and 4.4.3.
- 9) The footnotes have been removed from Appendix A.
- 10) Previous Appendix A: Attachment B which had Rule 21 Consent Order requirements for excess emissions 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
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478
michael.egnor@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)

On September 11, 2019, Christopher DeVoss of DuPont stated: “There isn’t a 170A emission point and it should be removed from vessel 29.” As a result Emission Point 170A has been struck through on Page 4 of the Section 1.0 Equipment Table.