Final Determination

Application Number: R13-3509
Facility ID Number: 073-00040
Name of Applicant: West Virginia Methanol, Inc.
Name of Facility: Pleasants County Methanol Plant
Location of Facility: Waverly, Pleasants County
Latitude/Longitude: 39.33832/-81.35305
Application Type: Construction
Submission Date: November 23, 2020 (Original); March 15, 2020 (Resubmitted)
Complete Date: March 24, 2021
Public Notice Date: March 31, 2021
Public Meeting Date: May 4, 2021
Engineer: Joe Kessler

Background Information

On March 31, 2021, the West Virginia Division of Air Quality (DAQ) provided notice to the public of a preliminary determination to issue Permit Number R13-3509 to West Virginia Methanol, Inc. (WVM) for the construction of a Methanol Plant proposed to be located at the former site of Cabot Corporation’s Ohio River Carbon Black Plant located along WV State Route 2 near Waverly, Pleasants County, WV at latitude 39.33832 and longitude -81.35305. At that time, the draft permit and Engineering Evaluation/Fact Sheet (EE/FS) were made available to the public for review. The permit application (both the original submission and the revised submission) had previously been made available for public review and remained so during the public comment period.

Promoting a Healthy Environment
As required by 45CSR13, the DAQ’s legal advertisement was published in the *St. Marys Oracle* on March 31, 2021, which began a 30-day public comment period that was scheduled to end at 5:00 P.M. on April 30, 2021. After receiving two (2) requests for a public meeting and the Director's subsequent determination that, pursuant to §45-13-9.1, a public meeting was warranted, an additional legal ad was published in the *St. Marys Oracle* on April 21, 2021 notifying the public that the DAQ was going to conduct a virtual public meeting on May 4, 2021. This advertisement also stated that the public comment period was being extended until 5:00 P.M. on May 7, 2021. Both public advertisements were Class I Legal Advertisements that ran in the *St. Marys Oracle*, a newspaper of general circulation in Pleasants County. On May 4, 2021, the DAQ held a virtual public meeting for permit application R13-3509 to provide information and to facilitate the submission of oral comments.

During the original and extended public comment periods, the DAQ accepted comments on our preliminary determination to issue permit R13-3509 to WVM. Pursuant to §45-13-8.8, a “Response to Public Comments” document has been prepared which provides a response to all formal written comments submitted to the DAQ and oral comments/questions provided at the public meeting. The “Response to Public Comments” document, as well as this “Final Determination” document, will be made available to all those who commented during the public notice period on the DEP website at the following address (hard copies will be provided upon request):

https://dep.wv.gov/daq/permitting/Pages/NSR-Permit-Applications.aspx

**SUMMARY OF COMMENTS RECEIVED**

From the date of the DAQ’s first public notice until the conclusion of the public comment period, the DAQ received forty-nine (49) comments (including public meeting requests) from various individuals and organizations concerning the proposed facility. Most public comments were non-technical and non-regulatory in nature either in support of issuance of the permit or against it. All of the supportive comments referenced the potential positive economic impacts of the proposed facility while many of the non-technical comments that were non-supportive expressed concern over the potential environmental or other detrimental impacts of the facility without providing a technical or regulatory basis for a reconsideration of the DAQ’s preliminary determination. However, specific technical and regulatory questions/comments were also submitted, including a large number in a package submitted by the Earth Justice on behalf of the Sierra Club and the Ohio Valley Environmental Coalition (OVEC). Technical and regulatory specific questions/comments were also submitted by the organization FreshWater Accountability Project and the individual Mr. Warren Peasco. Additionally, several technical and regulatory specific oral comments/questions were received at the public meeting. See the “Response to Public Comments” document for a complete discussion of the all the comments received and the responses thereto.

After a conducting a thorough review of the comments, it was determined that no information was presented that showed the draft permit (or the permitting process) was inconsistent with a reasonable reading of the intent of 45CSR13 or §22-5-1, *et. seq.* However, to address specific concerns and to strengthen the efficacy of the permit, several additions/revisions/corrections to the...
draft permit were made (see below for a detailed list of these changes). It is noted that changes to a draft permit during the public notice period are common and a normal part of the permitting process.

**CHANGES TO DRAFT PERMIT**

As a result of comments received by the public during the public notice period, changes to the draft permit were made to address appropriate concerns or to make corrections where applicable. The substantive changes are given in tabular form below. Please see the “Response to Public Comments” document for a discussion of the listed changes when made in response to a specific comment.

### Table 1: Additions/Revisions/Corrections to Draft Permit R13-3509

<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Permit Page(s)</th>
<th>Substantive Revision/Addition Description</th>
<th>Comment Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Table 1.0</td>
<td>3</td>
<td>Footnote (1) as added to Control Device column heading.</td>
<td>DAQ Correction</td>
</tr>
<tr>
<td>Table 4.1.3(d)</td>
<td>15</td>
<td>Particulate matter emissions in the “Per-HTCR Heater/Duct Burner Steady-State Aggregate Emission Limits” Table were corrected lower to represent individual unit emissions as opposed to aggregate limits.</td>
<td>DAQ Correction</td>
</tr>
<tr>
<td>Table 4.1.4(d)</td>
<td>17</td>
<td>“Tons/year” was added to Table 4.1.4(d) for clarity.</td>
<td>DAQ Correction</td>
</tr>
<tr>
<td>4.1.7(a)</td>
<td>20</td>
<td>(1) Closed Vent requirements for loading operations made explicit and (2) “closed dome loading” was defined.</td>
<td>EJ/SC/OVEC III(B)(5)</td>
</tr>
<tr>
<td>4.1.7(c)</td>
<td>20</td>
<td>Additional requirements for loading operations.</td>
<td>EJ/SC/OVEC III(B)(5)</td>
</tr>
<tr>
<td>4.1.8(e)</td>
<td>21</td>
<td>Methanol limitation in syngas sent to the flare was corrected.</td>
<td>DAQ Correction, EJ/SC/OVEC III(B)(2)</td>
</tr>
</tbody>
</table>

**FINAL DETERMINATION**

It is the determination of the writer, after consideration of all comments received, the available information continues to indicate that West Virginia Methanol, Inc.’s proposed facility, in accordance with the plans and specifications filed in Permit Application R13-3509 (and any revisions thereto noted in the file), as enforced under Permit Number R13-3509, should meet all applicable state and federal air quality rules and regulations.

Joe R. Kessler, PE
Engineer

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