

# 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 June 10, 2014.

Permit Number: **R30-03900011-2014**

Application Received: **June 28, 2017**

Plant Identification Number: **03-54-039-00011**

Permittee: **Clearon Corporation**

Facility Name: **South Charleston Chlorinated Dry Bleach Plant**

Mailing Address: **95 MacCorkle Avenue, South Charleston, WV 25303**

Permit Action Number: *MM02* Revised: *April 3, 2018*

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Physical Location:	South Charleston, Kanawha County, West Virginia
UTM Coordinates:	438.4 km Easting • 4,246.6 km Northing • Zone 17
Directions:	Exit 56 (Montrose Drive) on I-64. Turn right and go to the bottom of the hill and turn left at the light onto MacCorkle Avenue (Route 60). Go to 3rd stop light and turn right. Turn left at first driveway.

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### Facility Description

Clearon's primary products are purified cyanuric acid and chlorinated isocyanurates also known as CDB. The facility operates on a year-round basis, 24 hours per day, and 365 days per year.

Cyanuric acid is produced from the pyrolysis of urea. The cyanuric acid is used as the feed stock to produce various types of CDB's at the South Charleston Plant. CDB's are produced by chlorinating the cyanuric acid. Cyanuric acid is also sold to other manufacturers for the production of their chlorinated dry bleaches or as CDB stabilizers.

Cyanuric acid and chlorinated dry bleaches are used in production of swimming pool treatment chemicals, cleansers, dishwashing detergents and various other products whose primary functions are cleaning, disinfecting, and sanitizing.

Clearon proposes to replace the 20,000 gallon carbon steel sulfuric acid tank (T-1007) with a 20,000 gallon fiberglass sulfuric acid storage tank with kynar liner and dome bottom.

### Emissions Summary

There are no changes in emissions associated with this minor modification.

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 407.9 TPY of NOx. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Clearon Corporation 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:	45CSR7	PM from manufacturing processes and associated operations
	45CSR13	Permits for construction/modification
	45CSR30	Operating permit requirement

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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2050H	September 13, 2017	

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

The following changes have been made to the Title V Permit:

Section 1.0. - The Emission Units Table in Section 1.1. was updated by revising the Year Installed date for T-1007 from 1983 to 2017. The Active Permits Table in Section 1.2. was updated by changing R13-2050G, issued on 3/9/2016, to R13-2050H, issued on 9/13/2017.

45CSR7 - To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations, and 45CSR13, Permit No. R13-2050H - The replacement Tank T-1007 is subject to the mineral acid standard because the vessel emits sulfuric acid. According to 45CSR§7-4.2. and Table 45-7B, no vent is allowed to release sulfuric acid mist in concentrations greater than 35 mg/dscm (8.6 ppmvd), which is in condition 7.1.3. No changes were made to this condition or to the recordkeeping requirements in condition 7.4.5. for tank T-1007.

### **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 for minor modifications

Ending Date: N/A

### **Point of Contact**

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

Bobbie Scroggie  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478  
Bobbie.Scroggie@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**

Not applicable.