

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 19, 2017.

Permit Number: **R30-03900618-2017**
Application Received: **July 29, 2019**
Plant Identification Number: **03-54-03900618**
Permittee: **Univation Technologies, LLC**
Facility Name: **South Charleston Catalyst Plant**
Mailing Address: **P.O. Box 8361 South Charleston, WV 25303**

Permit Action Number: *MM01* Revised: April 10, 2020

Physical Location: South Charleston, Kanawha County, West Virginia
UTM Coordinates: 438.4 km Easting • 4,245.5 km Northing • Zone 17
Directions: From Charleston take Kanawha Turnpike exit. Travel west on Kanawha
Turnpike approximately 0.5 miles.

Facility Description

The facility produces organo metallic compounds that are shipped to other companies for use. Ancillary operations include small boilers to supply steam, analytical quality assurance and control laboratories, and container storage/shipping. SIC: 2869

Emissions Summary

There will be no changes to the potential to emit as a result of this modification.

Title V Program Applicability Basis

The Union Carbide Corporation Technology Park Operations (03900004) and Univation Technologies, LLC South Charleston Catalyst Plant (03900618) are considered a single source for Clean Air Act

permitting purposes. With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of VOC's. Due to these facilities' potential to emit over 100 tons per year of criteria pollutant, Univation Technologies, 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.

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:	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>)
R13-2631B	10/1/2019	

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:

- 1) The current version of R13- 2631B has been updated in Section 1.2.
- 2) Updated the correspondence address for EPA in Condition 3.5.3.
- 3) The requirement for submission of a compliance report on a semi-annual basis in Condition 4.4.5 has been removed. This emission data is already reported through the Title V Semi-Annual Deviation Reports and Annual Compliance Certifications.

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. 41255 • Fax: 304/926-0478

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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)

Not applicable.