

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 February 13, 2017.

Permit Number: **R30-03900693-2017**
Application Received: **December 12, 2019**
Plant Identification Number: **03-54-03900693**
Permittee: **Belle Chemical Company**
Facility Name: **Belle Plant**
Mailing Address: **901 W. DuPont Ave., Belle, WV 25015**

Permit Action Number: *MM01* Revised: *August 31, 2020*

Physical Location: Belle, Kanawha County, West Virginia
UTM Coordinates: 451.90 km Easting • 4,232.60 km Northing • Zone 17
Directions: I-64 to Belle exit, Route 60 east to Belle exit, turn right and plant is on the left.

Facility Description

Belle Chemical Company produces specialty chemical intermediates. The process units included are methylamines [monomethylamine (MMA), dimethylamine (DMA), trimethylamine (TMA), and ammonia storage], and amides [dimethylformamide (DMF), monomethylformamide (MMF), and dimethylacetamide (DMAC)].

Emissions Summary

There is no change in permitted emissions as a result of this modification.

Title V Program Applicability Basis

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 this facility's potential to emit over 100 tons per year of VOC's Belle Chemical Company 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	Preconstruction permits for minor sources.
	45CSR§21-5, 9, 41	Prevention and control of the emission of volatile organic compounds (VOC's)
	45CSR30	Operating permit requirement.
State Only:	45CSR§21-37	Leaks from Synthetic Organic Chemical, Polymer, and Resin Manufacturing Equipment.
	45CSR§21-40	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 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>)
R13-3230B	1/13/2020	

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 Chemours Company FC, LLC (03900001) sold part of their facility to the Belle Chemical Company (03900639). DAQ approved the transfer in a letter signed on February 20, 2020. Chemours divided their Title V Group 5 Permit into 5 of 5 and 5A of 5 in order to move the requirements for the part of the company to be sold into one Title V Permit. The entire Chemours facility was subject to consent orders

CO-R21-97-31 and CO-R21-C-2001-10A(97). R13-3230B was issued to incorporate and supersede the consent order requirements for the part of the company being sold. This modification includes the changes made in R13-3230B as well as the transfer of ownership to the Belle Chemical Company. The following changes have been made to the Permit:

The facility name has been changed from “The Chemours Company FC, LLC” to “Belle Chemical Company”.

The “Group 5A of 5” designation has been removed as the current owners will have one Title V Permit.

The permit number has been changed from “R30-03900001-2017” to “R30-03900693-2017”.

The revision number of the Permit has been changed from “AA01” to “MM01”.

The correspondence addresses for DAQ and EPA have been updated in Conditions 3.5.3, 3.5.5, and 3.5.6.

45CSR13, R13-3230 5.1.2 has been added to the citation in Condition 3.5.11.

45CSR13, R13-3230 5.1.3 has been added to the citations in Conditions 4.1.10 and 5.1.9. The references to the consent orders have been removed.

Condition 4.1.14 has been revised to remove references to the consent order and to match the language in R13-3230B Condition 5.1.4. Condition 5.1.11 has been revised to include the requirements of R13-3230B instead of referencing Condition 4.1.14.

45CSR13, R13-3230 5.3.1 has been added to the citation in Conditions 4.3.2 and 5.3.2. The references to the consent order have been removed.

45CSR13, R13-3230 5.3.2 has been added to the citation in Condition 4.3.3. The references to the consent order have been removed. Condition 5.3.3 has been revised to include the requirements of R13-3230B instead of referencing Condition 4.3.3.

45CSR13, R13-3230 5.4.1 has been added to the citations in Conditions 4.4.10 and 5.4.11. The references to the consent orders have been removed.

45CSR13, R13-3230 5.5.1 has been added to the citation in Condition 3.5.10.

45CSR13, R13-3230 5.5.2 has been added to the citations in Conditions 4.5.10 and 5.5.11. The references to the consent order have been removed.

The references to the consent order in the Table of Contents and APPENDIX A have 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. 41255
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)

Not applicable.