

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 August 1, 2017.

Permit Number: **R30-03900005-2017**
Applications Received: **May 22, 2019 (MM01)**
Plant Identification Number: **03-54-03900005**
Permittee: **Union Carbide Corporation**
Facility Name: **Institute Facility**
Mailing Address: **P.O. Box 8361 South Charleston WV 25303**

Permit Action Number: *MM01* Revised: *February 4, 2020*

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 is
located about ½ mile west on Route 25.

Facility Description

Organic liquids are pumped into barges at the facility. The barges are designed for submerged loading to reduce emissions. The barge emission unit source has been assigned Equipment Id. No. L1B and the emission point (hatch vent) has been assigned Id. No. B1L. Barges are equipped with pressure/vacuum relief vents. Pressure relief is set at 1 psig. The loading line to the barge hook-up is approximately 3 inch in diameter. The current fleet has 3 compartments per barge. Each compartment is loaded to approximately 130,000 – 140,000 gallons.

Emissions Summary

There will be an increase of 3.52 lbs/hr of VOC emissions, which includes HAPs. There will be no increase in tons per year 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 VOCs, over 100 tons per year of NO_x, over 100 tons per year of CO and over 25 tons per year of aggregate HAPs. Therefore, Union Carbide Corporation, Institute Facility, 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.
	45CSR30	Operating permit requirement.

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>)
R13-2646B	08-16-2019	

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 regarding R13-2646B:

- 1) The current version of R13- 2646B has been updated in Section 1.2.
- 2) Permitted emissions of VOCs, including HAPs have been increased from 9.6 lbs/hr to 13.1 lbs/hr in Condition 5.1.1. There is no increase in tons per year in this Condition.
- 3) Permitted emissions of Methyl Isobutyl Ketone (MIBK) have been increased from 1.1 tons per year to 1.12 tons per year in Condition 5.1.2.
- 4) The hourly loading rate in Condition 5.1.3 has been increased from 17,100 gallons per hour to 23,100 gallons per hour.

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

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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)

N/A