

Public Meeting

concerning

Specialty Products US, LLC

Institute Facility

March 11, 2024

**West Virginia Division of Air Quality
James C. Wilson University Union Ballroom
West Virginia State University
Institute, West Virginia**

Presentation Outline

- **Explanation of NSR and Title V Permitting Programs**
- **Summary of DAQ Review**
- **Facility Information and Applicable Requirements**
- **DAQ Documents and Collaborative Agreement**
- **What Happens Next?**
- **Contact Information**

Permitting Programs

- **NSR “Pre-construction” Permits**
 - **Minor Source Program (45CSR13)**
 - **Major Source in Attainment Areas (45CSR14)**
 - **“Prevention of Significant Deterioration” (PSD)**
 - **Major Source in Non-Attainment Areas (45CSR19)**
- **Post-Construction Operating Permit Program**
 - **Title V Process**
 - **Major Source (Permit) vs. Minor Source (No Permit)**
 - **45CSR30**

NSR Permitting Program

- **New facilities - construction permits; existing facilities - modification permits**
- **Engineers review the design of the facility, associated emissions, and regulatory requirements.**
- **Permits are issued which:**
 - **Establish emission and operating limitations**
 - **Include applicable state rules and federal regulations**
 - **Establish monitoring, testing, recordkeeping, and reporting to demonstrate compliance with limitations.**

Title V Permitting Program

The Title V program issues operating permits to major sources of emissions. A major source for Title V is defined as a facility having:

- **One or more criteria pollutants that are 100 tons per year or more;**
- **One or more hazardous air pollutants that are 10 tons per year or more;**
- **Aggregate hazardous air pollutants that are 25 tons per year or more.**

Title V Permitting Program

- The Title V program was established in the 1990s to issue operating permits that include all the facility's applicable air requirements including:
 - NSR Permit requirements, state rules, and federal regulations.
- The Title V permit does not establish new emission or operating limitations.
- The Title V Permit adds the requirements for annual compliance certifications and semi-annual reporting.

Comparing DAQ Permit Programs

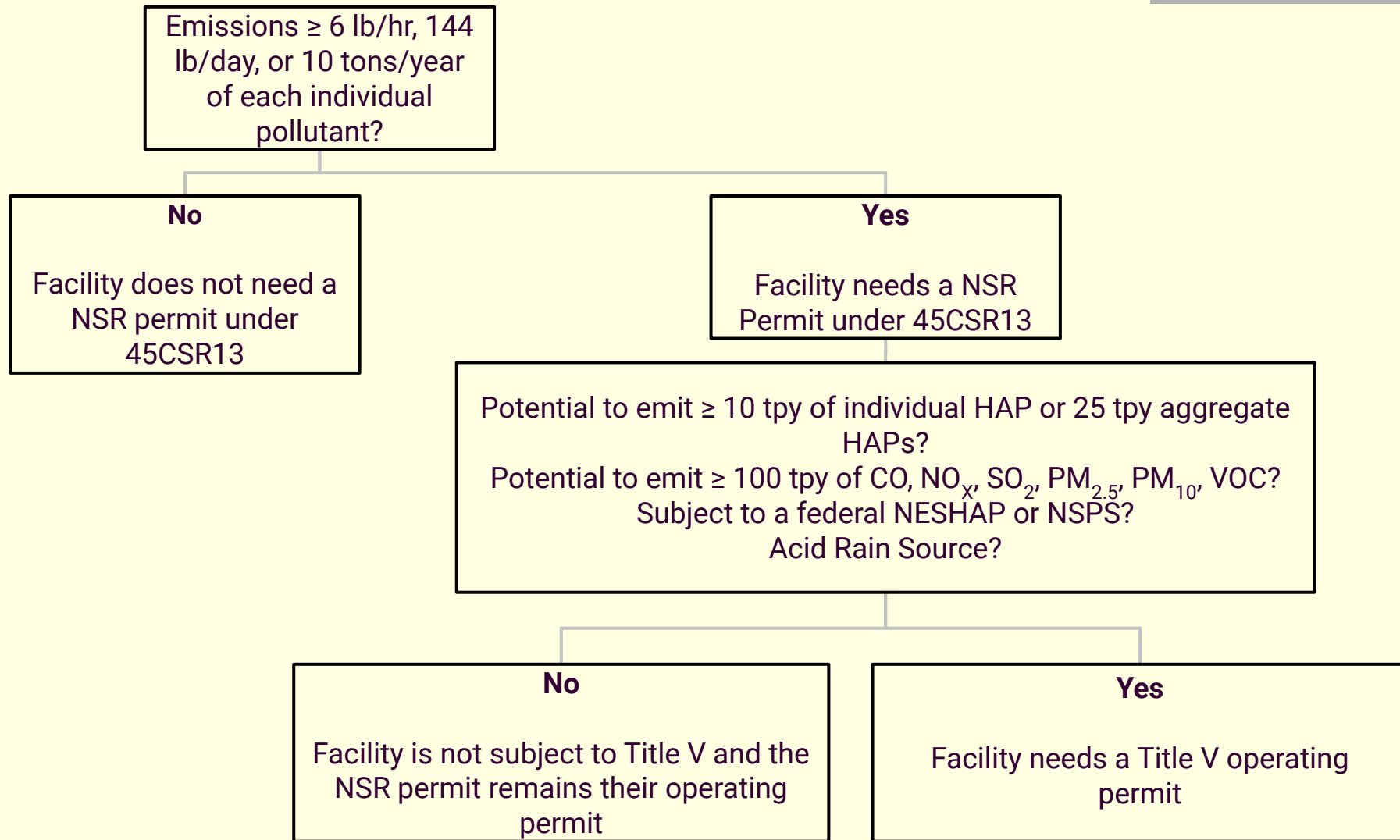
NSR Permit Program

- Permit do not expire
- “Construction” permits
- For Minor and Major sources
- No equivalent EPA Program

Title V Permit Program

- Permits expire after 5 years
- “Operating” Permits
- For Major Sources
- Every State has a Title V Program

Permitting Process



Summary of DAQ Review

- **Specialty Products US, LLC's Title V Application renewal submitted: June 8, 2022**
 - Application was submitted timely and deemed complete
 - By Rule Application Shield granted to the facility
- **Draft Permit Notice published: February 9, 2024**
 - Application available on DAQ website
 - Draft Permit and Fact Sheet available on DAQ website
- **Public Meeting & Hearing Notice published: February 9, 2024**
- **Public Meeting held: March 11, 2024 (in-person)**
- **Public Hearing to be held: March 19, 2024 (virtual)**
 - Registration form: <https://forms.gle/WfXexkzbeJrKLPJv5> (contains link to join)
 - If no internet, call Sandie Adkins or Nicole Ernest at (304) 926-0475 by 4 pm to register.
- **Written comments due by March 29, 2024 at 5 p.m.**

Specialty Products US LLC

Logistics Facility Information

- **The Polyox WSR® unit manufactures polyethylene oxide (PEO) by polymerizing ethylene oxide. Polyox WSR® is a water-soluble polymer used in pharmaceuticals, personal care products, adhesive, and flocculation markets.**
- **Specialty Products US LLC Control Devices**
 - **Flare – Combust VOCs**
 - **Scrubber – Control odors**
 - **2 Baghouses – Particulate Matter**

Facility-Wide Emissions Summary

Pollutants	Potential Emissions tpy	2022 Actual Emissions tpy
Carbon Monoxide	8.94	5.75
Nitrogen Oxides	1.65	1.06
Particulate Matter (PM _{2.5} , PM ₁₀ , TSP)	0.15	0.04
Sulfur Dioxide	1.05	<0.01
Volatile Organic Compounds (VOC)	620	66.87
Ethylene Oxide	0.7	0.48

Other HAPs at the facility include: Acetonitrile, propylene oxide, ethylene glycol, glycol ethers, isophorone, methanol, and hexane with potential emissions of 0.35 tpy.

Applicable Air Quality Rules

- **WV Legislative Rules**

- 45CSR4: No objectionable odors.
- 45CSR6: Control of Air Pollution from Combustion of Refuse
- 45CSR7: Particulate matter and opacity limits for manufacturing sources.
- 45CSR11: Standby plans for emergency episodes.
- 45CSR13: Construction Permits
- 45CSR§21-37 and 40 Control of VOC Emissions
- 45CSR27: Best Available Technology (BAT) for HAPs
- 45CSR30: Operating Permits (Title V)
- 45CSR34: Emission Standards for Hazardous Air Pollutants

- **Federal Air Quality Regulations**

- 40 C.F.R. Part 61, Asbestos inspection and removal
- 40 C.F.R. Part 63, Subpart PPP: Polyether Polyols MACT
- 40 C.F.R. Part 82, Subpart F: Ozone depletion substances

WVDAQ Documents

- **Fact Sheet**
 - Rationale document.
- **Draft Permit**
 - Includes existing NSR permit requirements, state rules, and federal regulations.

<https://dep.wv.gov/daq/permitting/titlevpermits/Pages/default.aspx>

Collaborative Agreement

A collaborative agreement was reached between WVDEP and Specialty Products US LLC on May 25, 2023 to reduce Ethylene Oxide emissions facility wide.

- **Update R13-3404A permit to reduce emission limitations on Ethylene Oxide and VOCs to reflect current business operations.**
 - Completed a feasibility study to route more EtO emitting emission units to existing control devices.
- **Enhanced LDAR – Action levels up to 1000 times more stringent than federal requirements.**

Component Type	Frequency	Weekly Visual	Action Threshold
Agitator	Monthly	Yes	10ppm
Connector - NTM*	Annual		10 ppm
Connector - DTM**	Annual		10ppm
Pump	Monthly	Yes	10ppm
Relief	Monitored After Release		10ppm
Valve-NTM*	Quarterly		10ppm
Valve -DTM**	Annual		10ppm

*NTM - Normal To Monitor

**DTM - Difficult To Monitor

What Happens Next?

- **Comment period scheduled to conclude ten (10) days after the virtual public hearing. (Friday, March 29, 2024 @ 5:00pm). All Title V documents will be available on the DAQ website.**
- **The DAQ will evaluate and respond to timely comments that are relevant to air quality issues and the Title V permit. Responses are included in the Statement of Basis of the Title V Fact Sheet.**
- **DAQ will Issue a Proposed Title V Permit**
 - **45 day EPA review/comment period.**
 - **Address any comments received from EPA**
- **DAQ will take final action on this permit application. Because the facility has an application shield, they continue to operate under the terms of their current permit until final action is taken on the renewal.**

Contact Information

Nikki Moats

nikki.b.moats@wv.gov

Phone: (304) 414-1282

Email comments to Nikki Moats or mail a hard copy to:

West Virginia Department of Environmental Protection

Division of Air Quality

Attn.: Sandra Adkins

601 57th Street, SE

Charleston, WV 25304

Include “Specialty Products US, LLC comments” in the subject line for all comments.