

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 July 20, 2020.

Permit Number: **R30-03900749-2020 (4A of 5)**
Application Received: **June 21, 2023**
Plant Identification Number: **03900749**
Permittee: **PureTech Scientific LLC**
Facility Name: **Belle Plant**
Mailing Address: **901 W. DuPont Ave.**
Belle, WV 25015

Permit Action Number: *MM01* Revised: *February 26, 2024*

Physical Location: Belle, Kanawha County, West Virginia
UTM Coordinates: 451.90 km Easting • 4232.60 km Northing • Zone 17
Directions: US Route 60 exit, then right onto Dupont Avenue, then left at plant gate.

Facility Description

Production of glycolic acid.
SIC codes: 2869; 2879

Emissions Summary

According to the application, there are no changes to emissions associated with this minor modification.

Title V Program Applicability Basis

PureTech Scientific LLC is subject to the requirements of 40 C.F.R. 63, Subpart FFFF (MON MACT), therefore, they are required to have a Title V permit.

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 45CSR§21-5.2 45CSR30	Preconstruction permits for minor sources VOC Emissions Operating permit requirement.
State Only:	45CSR§21-40 45CSR27	VOC Emissions Toxic Air Pollutants

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>)
R13-1534D	9/29/2023	

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

This minor modification R30-03900749-2020 (MM01) (Part 4A of 5) incorporates the changes permitted under R13-1534D. R13-1534D incorporated the applicable requirements from consent orders CO-R21-97-31 and CO-R27-92-45A(91) into the NSR permit. The following changes have been made under this minor modification:

The Permit number in Section 1.2 has been updated.

R13-1534D has been added to Condition 3.1.9.

Consent order CO-R27-91-40A has been removed from the citations for Conditions 3.1.10, 3.1.11, 3.1.12, 3.1.13, and 3.1.14.

The citation of Condition 5.1.18 was changed. Reference to consent order CO-R21-97-31 was replaced with reference to 45CSR13, Permit No. R13-1534-(Condition 4.1.20.).

The citation of consent order CO-R21-97-31 of Condition 5.1.19 was removed.

The citation of Condition 5.1.20 was changed. Reference to consent order CO-R27-92-45A(91) was replaced with reference to 45CSR13, Permit No R13-1534-(Condition 4.1.21.).

The citation of Condition 5.1.21 was changed. Reference to consent order CO-R27-92-45A(91) was replaced with reference to 45CSR13, Permit No. R13-1534-(Condition 4.1.22.).

The citation of Condition 5.1.22 was changed. Reference to consent order CO-R27-92-45A(91) was replaced with reference to 45CSR13, Permit No. R13-1534-(Condition 4.1.23.).

The citation of Condition 5.1.23 was changed. Reference to consent order CO-R27-92-45A(91) was replaced with reference to 45CSR13, Permit No. R13-1534-(Condition 4.1.24.).

The citation of Condition 5.1.24 was changed. Reference to consent order CO-R21-97-31 was replaced with reference to 45CSR13, Permit No. R13-1534-(Condition 4.1.25.).

The citation of Condition 5.2.3 was changed. Reference to consent order CO-R21-97-31 was replaced with reference to 45CSR13, Permit No. R13-1534-(Condition 4.2.3.).

For Attachment A, CO-R27-92-45A in the Attachment A title was replaced with R13-1534.

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:

Jonathan Carney
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41247
jonathan.w.carney@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)

N/A