

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03900692-2021**  
Application Received: **March 3, 2020**  
Plant Identification Number: **03-54-03900692**  
Permittee: **ALTIVIA Services, LLC**  
Facility Name: **Institute Plant**  
Business Unit: **Emergency Services (Group 6 of 8)**  
Mailing Address: **250 Carbide Road**  
**Dunbar WV, 25064**

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Physical Location: Institute, Kanawha County, West Virginia  
UTM Coordinates: 432.19 km Easting • 4,248.75 km Northing • Zone 17  
Directions: The facility is located west of Institute, WV, adjacent to State Route 25.

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### Facility Description

The Emergency Services Unit consists of one (1) emergency generator, three (3) fire water pumps, and three (3) fuel tanks.

### Emissions Summary

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Emergency Services (Group 6 of 8) Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2019 Actual Emissions
Carbon Monoxide (CO)	1.4	0.09
Nitrogen Oxides (NO <sub>x</sub> )	6.2	0.33
Particulate Matter (PM <sub>2.5</sub> )	<0.01	<0.01
Particulate Matter (PM <sub>10</sub> )	0.22	<0.01

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<b>Emergency Services (Group 6 of 8) Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2019 Actual Emissions</b>
Total Particulate Matter (TSP)	0.96	0.01
Sulfur Dioxide (SO <sub>2</sub> )	0.25	0.02
Volatile Organic Compounds (VOC)	0.25	0.02
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2019 Actual Emissions</b>
Total HAPs	<0.1	<0.01

*Some of the above HAPs may be counted as PM or VOCs.*

### **Title V Program Applicability Basis**

Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, ALTIVIA Services LLC's Institute Plant 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:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction, modification, relocation, and operation of stationary sources
	45CSR16	Standards of performance for new stationary sources
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission standards for HAP's
	40 C.F.R. 60, Subpart IIII	Standards of performance for stationary compression ignition internal combustion engines
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63, Subpart ZZZZ	NESHAP for stationary reciprocating internal combustion engines
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	State Only:	45CSR4

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> )
G60-C023A	October 27, 2015	
G60-D	May 9, 2018	

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

There has been no change to the equipment in the Emergency Services unit since the previous Title V renewal in 2015 though the permit has changed owner twice during the previous permit term as shown below.

- The 2015 Renewal was issued to Bayer CropScience as R30-03900007-2015(Group 1A of 8)
- Union Carbide Corporation purchased the assets and changed the permit to R30-03900005-2015(Group 6 of 8).
- ALTIVA Services LLC purchased the assets of the Emergency Services (Group 6 of 8) section of the Union Carbide Corporation Institute Plant prior to submitting the application for this renewal (R30-03900692-2021(Group 6 of 8).

The applicable requirements for the Emergency Service unit are discussed below:

- The Emergency Generator (EG-1) and its fuel tank (T-EG) have applicable requirements from R13 General Permit Registration G60-C023 and General Permit G60-D. These requirements have been included in the Title V permit as Sections 4.0 and 5.0.
- The Emergency Generator (EG-1) is subject to 40CFR60, Subpart IIII and 40CFR63, Subpart ZZZZ. The applicable requirements of 60CFR60, Subpart IIII are included it the Title V permit as Section 6.0.
- The Emergency Generator (EG-1) is subject to 40CFR63 Subpart ZZZZ. Condition 7.1.1 was added to show that engine EG-1 would comply with 40 C.F.R. 63 Subpart ZZZZ by meeting the requirements od 40 C.F.R. 60 Subpart IIII per 40 CFR§63.6590(c)(6).
- The diesel fueled Fire Water Pumps (P-302, P-1019, and P-1020) are subject to the existing Stationary Rice (the pumps were constructed before June 12, 2006) requirements of 40CFR63, Subpart ZZZZ. The applicable 40 C.F.R. 63 Subpart ZZZZ requirements for P-302, P-1019, and P-1020 have not changes since the last permit renewal and are contained in Section 7.0.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

#### **40CFR60, Subpart III**

The Fire Water Pumps (P-302, P-1019, and P-1020) were constructed before the applicability date of July 11, 2005 for 40CFR60, Subpart III.

### **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: November 17, 2020  
Ending Date: December 17, 2020

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Robert Mullins  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 412865  
Robert.A.Mullins@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.