



## Emissions Summary

This modification results in an increase of 7.30 tons per year of VOCs.

## 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 a criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs. 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 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 45CSR30	Preconstruction permits for minor sources. Operating permit requirement.
State Only:	45CSR21	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> )
R13-3474A	May 3, 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 Title V minor modification incorporates the changes approved under R13-3474A to add isopropanol storage tanks T1005 and T1010. The changes made to the Title V permit are as follows:

Tank T1005 and Tank T1010 were added to the Section 1.1 Emission Units table.

Section 4.1.15. was added to limit the use of Tank T1005 and Tank T1010 to isopropanol storage and add internal floating roof (IFR) requirements. The IFR requirements listed in 4.1.15 include operating requirements, and seal, cover and gasket requirements.

Section 4.2.2 was added to require inspection of the IFR and primary seal prior to filling the storage vessel.

Section 4.2.3 was added to require visual inspection of the IFR and primary seal through manholes and roof hatches on the fixed roof at least once every 12 months along with required actions in the event a failure is detected.

Section 4.2.4. was added to require visual inspection of the IFR, the primary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. It also includes required actions in the event of detected failures.

Section 4.2.5 was added to require notification to the administrator prior to filling or refilling storage vessels (Tank T1005/Tank T1010).

Sections 4.4.12, 4.4.13, 4.4.14 and 4.4.15 were added to require relevant recordkeeping for the IFR inspections, storage vessel dimensions and capacities, and true vapor pressure of the isopropanol. These requirements apply to Tank T1005 and Tank T1010.

Section 4.5.12 and 4.5.13 were added to require relevant reporting that applies to the IFR specifications and inspections of Tank T1005 and Tank T1010.

Tank T1005 and Tank T1010 were added to Appendix A.

Additional changes made to the Title V permit include changes to Title V boilerplate conditions 2.1.3, 2.17, 3.5.3, 3.5.4, 3.5.7, 3.5.8.a.1, and 3.5.8.a.2; and the replacement of Rule 21 consent order requirements from CO-R21-97-41 with the requirements from R13-3474A which affected conditions 3.5.10, 3.5.11, 4.1.12, 4.1.13, 4.3.4, 4.3.5, 4.4.8, 4.5.7, and the Appendix.

## **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 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/926-0499 ext. 41247  
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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)**

Not applicable.