

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03900011-2024**

Application Received: **October 6, 2023**

Plant Identification Number: **03-054-03900011**

Permittee: **Innovative Water Care LLC**

Facility Name: **South Charleston Chlorinated Dry Bleach Plant**

Mailing Address: **95 MacCorkle Avenue, South Charleston, WV 25303**

Physical Location: South Charleston, Kanawha County, West Virginia
UTM Coordinates: 438.4 km Easting • 4,246.6 km Northing • Zone 17
Directions: Exit 56 (Montrose Drive) on I-64. Turn right and go to the bottom of the hill and turn left at the light onto MacCorkle Avenue (Route 60). Go to 3rd stop light and turn right. Turn left at first driveway.

Facility Description

Innovative Water Care LLC's primary products are purified cyanuric acid and chlorinated isocyanurates also known as CDB. The facility operates on a year-round basis, 24 hours per day, and 365 days per year.

Cyanuric acid is produced from the pyrolysis of urea. The cyanuric acid is used as the feed stock to produce various types of CDB's at the South Charleston Plant. CDB's are produced by chlorinating the cyanuric acid. Cyanuric acid is also sold to other manufacturers for the production of their chlorinated dry bleaches or as CDB stabilizers.

Cyanuric acid and chlorinated dry bleaches are used in production of swimming pool treatment chemicals, cleansers, dishwashing detergents and various other products whose primary functions are cleaning, disinfecting, and sanitizing.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]

Regulated Pollutants	Potential Emissions	2023 Actual Emissions
Carbon Monoxide (CO)	46.54	7.23
Nitrogen Oxides (NO _x)	408.73	9.53
Particulate Matter (PM _{2.5})	65.44	7.55
Particulate Matter (PM ₁₀)	65.44	9.06
Total Particulate Matter (TSP)	65.44	17.93
Sulfur Dioxide (SO ₂)	6.42	0.47
Volatile Organic Compounds (VOC)	7.12	0.49

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2023 Actual Emissions
Chlorine	8.80	1.24

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

Title V Program Applicability Basis

This facility has the potential to emit 407.92 TPY of NO_x. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Innovative Water Care 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM and Opacity Standards for Indirect Fuel Burning Units
	45CSR6	Open burning prohibited.
	45CSR7	PM and Opacity Standards for Manufacturing Processes
	45CSR10	Standards for Sulfur Dioxide
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction/modification
	45CSR16	New Source Performance Standards
	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 HAPs
	40 C.F.R. 60 Subpart Dc	NSPS for Small Steam Generating Units
	40 C.F.R. 60 Subpart IIII	NSPS for Compression Ignition Engines
	40 C.F.R. Part 61	Asbestos inspection and removal

	40 C.F.R. 63 Subpart ZZZZ	RICE MACT
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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>)
R13-0894	10/6/86	
R13-1698B	5/16/23	
R13-1724A	7/17/03	
R13-1922A	1/28/03	
R13-2050H	9/13/17	
R13-2597	10/25/04	
R13-2931	7/23/12	
G60-C045	6/11/12	
G60-D109	7/26/21	

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

The following changes have been made as a part of this renewal.

- **Section 1.0**
 - Emergency Generator EG-600 from Permit G60-D109 was added to the Emission Units Table.
 - Permit G60-D109 was added to Table 1.2

- **Section 11.0**

- Conditions 11.1.10, 11.1.15, 11.1.17, 11.1.26, 11.1.27, 11.3.5, 11.4.10, and 11.5.7 were updated to reflect the most recent versions of 40 C.F.R. 60 Subpart III and 40 C.F.R. 63 Subpart ZZZZ.
- EG-600 from Permit G60-D109 was added into conditions 11.1.2, 11.1.5, 11.1.8 – 11.1.17, 11.1.19, 11.2.1.b, 11.3.5, 11.3.6, 11.4.5 – 11.4.7, 11.4.9, 11.5.2, and 11.5.3.
- Emission limits for EG-600 were added as condition 11.1.28.
- Added reporting requirements of 40 C.F.R. §60.4214(d) for engines EG-200, EG-514, and EG-600 as condition 11.5.8.

Non-Applicability Determinations

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

- a. **40 C.F.R. 63 Subpart DDDDD** — *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*. The facility is not a major source of HAP. Therefore, 40 C.F.R. Part 63, Subpart DDDDD does not apply to the boilers H-110 and H-112.
- b. **40 C.F.R. 63 Subpart UUUUU** — *National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Utility Steam Generating Units*. The boilers H-110 and H-112 are not coal- or oil-fired units, and are not EGUs as defined in 40 C.F.R. §63.10042.
- c. **40 C.F.R. 63 Subpart JJJJJ** — *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*. This regulation applies to an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195. According to §63.11195(e), gas-fired boilers (as defined in the regulation) are not subject to Subpart JJJJJ or to any requirement of the regulation. §63.11237 specifies that a gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year. According to the renewal application, the boilers combust only natural gas; therefore, boilers H-110 and H-112 meet the definition of gas-fired boiler and are therefore not subject to 40 C.F.R. 63 Subpart JJJJJ.
- d. **40 C.F.R. Part 64 Compliance Assurance Monitoring (CAM)**. None of the sources at the facility meet all of the applicability criteria in 40 C.F.R. §§64.2(a)(1) through (3); therefore, CAM is not applicable to any source at the facility.
- e. **Condition 5.1.12. of Permit No. R13-2931** – This requirement for a backpressure monitor for a diesel particulate filter is not applicable to the engine EG-514 since it is not equipped with a control device.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

None.

Comment Period

Beginning Date: July 10, 2024
Ending Date: August 9, 2024

Point of Contact

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

Nikki B. Moats
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/414-1282
Nikki.b.moats@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)