

# Fact Sheet



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

Permit Number: **R30-03900618-2022**  
Application Received: **August 19, 2021**  
Plant Identification Number: **039-00618**  
Permittee: **Univation Technologies, LLC**  
Facility Name: **South Charleston Catalyst Plant**  
Mailing Address: **P.O. Box 8361 South Charleston, WV 25303**

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Physical Location: South Charleston, Kanawha County, West Virginia  
UTM Coordinates: 438.4 km Easting • 4,245.5 km Northing • Zone 17  
Directions: From Charleston take Kanawha Turnpike exit. Travel west on Kanawha Turnpike approximately 0.5 miles.

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### Facility Description

The facility produces organo metallic compounds that are shipped to other companies for use. Ancillary operations include small boilers to supply steam, analytical quality assurance and control laboratories, and container storage/shipping. SIC: 2869

### Emissions Summary

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Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Univation Potential Emissions	Univation 2020 Actual Emissions
Carbon Monoxide (CO)	4.2	0.54
Nitrogen Oxides (NO <sub>x</sub> )	2.0	0.47
Particulate Matter (PM <sub>2.5</sub> )	1.0	0.05

**Plantwide Emissions Summary [Tons per Year]**

<b>Regulated Pollutants</b>	<b>Univation Potential Emissions</b>	<b>Univation 2020 Actual Emissions</b>
Particulate Matter (PM <sub>10</sub> )	1.0	0.05
Total Particulate Matter (TSP)	1.0	0.05
Sulfur Dioxide (SO <sub>2</sub> )	0.1	0.01
Volatile Organic Compounds (VOC)	5.3	1.67

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Univation Potential Emissions</b>	<b>Univation 2020 Actual Emissions</b>
Toluene	2	1.65
2,2,4-Trimethylpentane	3	0.02
Hexane	0.1	0.00
Total HAPs	5.1	1.67

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

**Title V Program Applicability Basis**

The Union Carbide Corporation Technology Park Operations (03900004) and Univation Technologies, LLC South Charleston Catalyst Plant (03900618) are considered a single source for Clean Air Act permitting purposes and have the potential to emit over 100 tons per year of VOC's. Due to these facilities' potential to emit over 100 tons per year of criteria pollutant, Univation Technologies, 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	Particulate Matter emissions
	45CSR6	Open burning prohibited.
	45CSR7	Particulate Matter emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor 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 HAPs pursuant to 40 C.F.R. Parts 61 and 63.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart FFFF	Miscellaneous Organics NESHAP (MON)

	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> )
R13-2631B	10/1/2019	

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 is the first renewal for this facility, and all changes since the initial permit were addressed in R30-03900618-2017 (MM01) which was signed on April 10, 2020.

The permittee requested that condition 3.7.2.c be added to the permit in this renewal, as it was included in the fact sheet for the initial permit but not included in the initial permit.

Condition 3.7.2.b was updated with new language adding more explanation to the facility's 40 C.F.R. 64 non-applicability determination.

There were revisions to 40 C.F.R. 63 Subpart FFFF (MON) since the initial Title V permit; however, this did not result in any changes to Univation's applicable requirements under the MON.

**Non-Applicability Determinations**

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

**40 C.F.R. Part 68 Risk Management Plan.**

Univation is not required to submit a risk management plan because the South Charleston Catalyst Plant does not produce, handle, process, distribute, or store chemicals listed in 40 CFR § 68.130 at equal to or greater than threshold amounts. (40 CFR §68.130(a))

**40 C.F.R. Part 64.**

The Univation Technologies South Charleston Catalyst Plant Processes are not subject to the Compliance Assurance Monitoring (CAM) rule because they are subject to 40 C.F.R. Part 63 Subpart FFFF that was proposed after November 11, 1990 (exempt per 40CFR§64.2(b)(1)(i)) and the Dumping Bag Station (K02)

is not a major source of PM or PM<sub>10</sub> emissions before controls (3.7 tpy pre-controlled emissions; 80% control efficiency for PM and PM<sub>10</sub> as permitted under R13-2631).

**40CFR63, Subpart JJJJJ: NESHAPS for Industrial, Commercial, and Institutional Boilers Area Sources.**

Boilers #1 and #2 are not subject to this area source MACT because they are fueled only by natural gas 40CFR§63.11195(e).

**40 C.F.R. Part 63, Subpart EEEE: Organic Liquids Distribution (Non-Gasoline) NESHAP**

For transfer racks that unload organic liquids containing 5% by weight of hazardous air pollutants 40CFR§63.2343(a) requires the permittee to keep records that the transfer racks are not subject to controls. This is given in Condition 4.4.7.

**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: April 14, 2022

Ending Date: May 16, 2022

**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 57<sup>th</sup> Street SE

Charleston, WV 25304

Phone: 304/926-0499 ext. 41282

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)**

None.