

# 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 the Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on November 21, 2016.

Permit Number: **R30-03900663-2016**

Applications Received: **July 26, 2016 (MM01) and October 27, 2016 (MM02)**

Plant Identification Number: **039-00663**

Permittee: **Optima Belle LLC**

Facility Name: **Belle Plant**

Mailing Address: **901 W DuPont Avenue, Belle WV, 25015**

Permit Action Number: MM01 and MM02 Revised: March 21, 2017

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Physical Location: Belle, Kanawha County, West Virginia  
UTM Coordinates: 451.90 km Easting • 4,232.60 km Northing • Zone 17  
Directions: US Route 60 exit, then right onto Dupont Avenue, then left at plant gate.

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### Facility Description

Manufacture of various organic and specialty chemicals

SIC Codes: 2869; 2879

### Emissions Summary

MM01: The following emissions are a result of the new Catofin process modification.

Regulated Pollutant	Change in permitted Emissions	
	lb/hr	lb/yr
VOC	0.46	60
Total HAP's	0.46	60
Particulate Matter	0.26	80

MM02: The following emissions are a result of the new D-Mannose process modification.

Regulated Pollutant	Change in permitted Emissions	
	lb/hr	lb/yr
VOC	2.40	340
Total HAP's	0.09	40
Particulate Matter	0.24	60

### Title V Program Applicability Basis

With the proposed changes associated with this permitting action, this facility maintains the facility-wide potential to emit over 10 tons per year of a single HAP. Therefore, Optima Belle 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:	45CSR7	Particulate Matter From Manufacturing Processes
	45CSR13	Permits for construction, modification, relocation, etc.
State Only:	None	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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> )
R13-0882L	November 21, 2016	
R13-0882M	December 15, 2016	

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 B, which may be downloaded from DAQ's website.

### **Determinations and Justifications**

#### MM01 changes due to R13-0882L

1. Added a Double Cone Dryer (230), Condenser (232C), Reactors (232 and 233), Dust Collector (117), DCD Super Sack/Drum Loading (234), and DCD Super Sack/Drum Unloading (235) to the equipment table.
2. Added Condition 4.1.2.11.1 to require that the Dust Collector (117) be used when either the DCD Super Sack Loading (234) or DCD Super Sack Unloading (235) are being operated.
3. Added Condition 4.1.2.11.2 to require that the incinerator (009) and scrubber (010) be used at emission point 104.014 during all periods of either refining Catofin, refining SR-1000, or production of T2960. A limit for the total batches of each has also been added.
4. Added Condition 4.1.2.11.3 to require specific emissions limits for Particulate Matter, VOC's, p-xylene, and toluene for Catofin refinement, SR-1000 refinement, and T2960 production.
5. Added "R13-0882L" to Condition 3.1.10.

#### MM02 changes due to R13-0882M

1. Updated the Permit Number to R13-0882M in Section 1.2.
2. Added Condition 4.1.2.12.1 to require that the Dust Collector (023) be used during the D-Mannose process when the product packout (210) is being operated.
3. Added Condition 4.1.2.12.2 to require that the incinerator (009) be used at emission point 104.014 during all periods of the D-Mannose process. A limit for the total number of batches per year has also been added.
4. Added Condition 4.1.2.12.3 to require specific emissions limits for Particulate Matter, VOC's, Methanol, and Ethanol for the D-Mannose process.
5. Added "R13-0882M" to Condition 3.1.10.
6. Updated the page numbers in the Table of Contents

#### Miscellaneous

1. The emission point for Incinerator (009) has been corrected from "114.014" to "104.014" in the following Conditions: 4.1.2.1.2, 4.1.2.6.7, 4.1.2.6.9, 4.1.2.8.2, 4.1.2.9.2, and 4.1.2.10.2.
2. Added Incinerator (009) to the Source Table in Table 4.1.2.11.3.

### **Non-Applicability Determinations**

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The following requirements have been determined not to be applicable to the subject facility due to the  
West Virginia Department of Environmental Protection • Division of Air Quality

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

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

Michael Egnor  
Engineer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

**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.

**Point of Contact**

Michael Egnor  
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. 1208 • Fax: 304/926-0478

**Response to Comments (Statement of Basis)**

N/A