Fact Sheet



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

Permit Number: R30-03900692-2021 Application Received: July 21, 2020 Plant Identification Number: 03-54-03900692

Permittee: **ALTIVIA Services, LLC** Facility Name: **Institute Plant**

Business Unit: Wastewater Treatment and Maintenance Operations (Group 7 of 8)

Dunbar WV, 25064

Mailing Address: 250 Carbide Road

Physical Location: Institute, Kanawha County, West Virginia

UTM Coordinates: 432.19 km Easting • 4,248.31 km Northing • Zone 17

Directions: The facility is located west of Institute, WV, adjacent to State Route 25

and West Virginia State University

Facility Description

Wastewater Treatment and Maintenance Operations consist of the site's wastewater treatment unit, the maintenance department, and two emergency engines (identified in G60-C054A as EG-1 and EG-2 but renamed P-319 and P-354, respectively).

Emissions Summary

Plantwide Emissions Summary [Tons per Year]					
Regulated Pollutants	Potential Emissions	2019 Actual Emissions			
	Wastewater Treatment and Maintenance Operations	Wastewater Treatment and Maintenance Operations			
Carbon Monoxide (CO)	< 2.0	0.09			
Nitrogen Oxides (NO _X)	< 4.0	0.33			
Particulate Matter (PM _{2.5})	< 1.0	0.01			
Particulate Matter (PM ₁₀)	< 1.0	0.04			
Total Particulate Matter (TSP)	< 1.0	0.17			
Sulfur Dioxide (SO ₂)	< 1.0	0.02			
Volatile Organic Compounds (VOC)	62	15.82			

 PM_{10} is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2019 Actual Emissions	
	Wastewater Treatment and Maintenance Operations	Wastewater Treatment and Maintenance Operations	
Ethylene Glycol	15	2.24	
Total HAPs	23	14.45	

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

Title V Program Applicability Basis

Due to the facility-wide potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and 25 tons per year 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.
	45CSR7	PM from manufacturing processes
	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
45CSR4	No objectionable odors.
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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

State Only:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-1033	September 1, 1988	
R13-1248	July 23, 1990	
G60-C054A	May 26, 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 Wastewater Treatment and Maintenance Operations unit since the previous Title V renewal in 2016 however the permit has changed owners during the previous permit term as shown below.

 ALTIVIA Services, LLC purchased the assets of the Wastewater Treatment and Maintenance Operations R30-03900005-2016 (Group 7 of 8) from Union Carbide Corporation Institute Plant prior to submitting the application for this renewal. This renewal will be issued as R30-03900692-2021 (Group 7 of 8). The changes to the Title V permit since the last renewal are as follows:

- In the previous Title V permit, the general permit registration G60-C054A and general permit G60-C were attached as Attachment A and Attachment B, but the applicable requirements are now being incorporated into sections 5 & 6 of this permit and will no longer be included as attachments. Additionally, Class II General Permit G60-C was superseded and replaced by Class II General Permit G60-D. Therefore, all the general permit requirements, included in this Title V permit, are based on the latest version of the general permit (G60-D).
- The Emergency Engines (identified in G60-C054A as EG-1 and EG-2 but renamed P-319 and P-354, respectively) and the diesel storage tanks T-CS and T-WS have applicable requirements from R13 General Permit Registration G60-C054A and General Permit G60-D. These requirements have been included in the Title V permit as Section 5.0.
- The Emergency Engines (P-319 and P-354) are subject to 40CFR60, Subpart IIII and 40CFR63, Subpart ZZZZ. Per 40 CFR§63.6590(c)(6), a new emergency RICE with a site rating of less than 500 hp located at a major source of HAP's must meet the requirements of 40CFR63, Subpart ZZZZ by meeting the requirements of 40CFR60 Subpart IIII. The applicable requirements of 40CFR60, Subpart IIII are included in the Title V permit as Section 6.0.

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: March 19, 2021 Ending Date: April 19, 2021

Point of Contact

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

Beena Modi West Virginia Department of Environmental Protection Division of Air Quality 601 57th Street SE Charleston, WV 25304

Phone: 304/926-0499 ext. 41283

Beena.j.modi@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.

None