

Fact Sheet



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

Permit Number: **R30-03900663-2016**
Application Received: **November 13, 2015**
Plant Identification Number: **039-00663**
Permittee: **Optima Belle LLC**
Facility Name: **Belle Plant**
Mailing Address: **901 W. DuPont Avenue, Belle WV, 25015**

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.

Facility Description

Optima Belle LLC manufactures various organic and specialty chemicals.

SIC Codes: 2869; 2879; 2821

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Carbon Monoxide (CO)	1.50	*
Nitrogen Oxides (NO _x)	49.40	*
Particulate Matter (PM _{2.5})	1.77	*
Particulate Matter (PM ₁₀)	1.77	*
Total Particulate Matter (TSP)	1.77	*

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Sulfur Dioxide (SO ₂)	0.11	*
Volatile Organic Compounds (VOC)	25.04	*

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2015 Actual Emissions
Methanol	16.81	*
Total HAP's	24.00	*

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

* - The facility took ownership of this part of the Chemours Belle facility on June 12, 2015. The facility only operated 45 days from June 12, 2015 until December 31, 2015. As this is not a representative description of actual emissions for this facility, the actual emissions have been omitted from the fact sheet.

Title V Program Applicability Basis

This facility has the 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.

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

Federal and State:	45CSR6 45CSR7 45CSR11 45CSR13 WV Code § 22-5-4 (a) (14) 45CSR30 45CSR34 40 C.F.R. Part 63 Subpart FFFF 40 C.F.R. Part 61 40 C.F.R. Part 82, Subpart F	Open burning prohibited. Particulate Matter emissions Standby plans for emergency episodes. Permits for construction, modification, relocation, etc. The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Emission Standards for HAP's MON MACT Asbestos inspection and removal Ozone depleting substances
State Only:	45CSR4 45CSR21	No objectionable odors. 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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-0882K	July 11, 2016	
R13-2093D	August 8, 2007	

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 to the most recent version of this Permit:

MM02 changes from R13-0882J (Sodium Tetraphenyl Borate 'STPB' Production):

1. Added two polish filters to the equipment table under Fugitive Emissions.
2. Added Condition 4.1.2.8.1 to require that the dust collector (114) be used when solids are charged to the reactor.
3. Added Condition 4.1.2.8.2 to require that the incinerator (009) and scrubber (010) be used at emission point 114.014 during all periods of Sodium Tetraphenyl Borate (STPB) production.
4. Added Condition 4.1.2.8.3 to require that Dust Collector (023) be used by emission point 107.022 when packaging solids to drums.
5. Added Condition 4.1.2.8.4 to require specific emissions limits for particulate matter, VOC's, and HAPs for STPB production.
6. The "Tank" (103) in the equipment table has been renamed "A Tank" .
7. The Gas Cylinders (200) have been removed from the equipment table.
8. The Centrifuge Feed Tank (228) has been added to the equipment table.

MM03 changes from R13-0882K (L-alanine methyl ester 'LAME' Production):

1. Added a tanker truck (229) and filter (fugitive) to the equipment table.
2. Added Condition 4.1.2.9.1 to require that the dust collector (115) be used when solids are charged to the reactor.

3. Added Condition 4.1.2.9.2 to require that the incinerator (009) and scrubber (010) be used at emission point 114.014 during all periods of dried L-alanine methyl ester (LAME) production. Scrubber (003) shall be in operation and employed for only Reactor 6 (208) during the reaction step.
4. Added Condition 4.1.2.9.3 to require that Dust Collector (023) be used by emission point 107.022 when packaging solids to drums.
5. Added Condition 4.1.2.9.4 to require specific emissions limits for particulate matter, VOC's, SO₂, and HAPs for dried LAME production.
6. Added Condition 4.1.2.10.1 to require that the dust collector (115) be used when solids are charged to the reactor.
7. Added Condition 4.1.2.10.2 to require that the incinerator (009) and scrubbers (003) and (010) be used at emission point 114.014 during all periods of undried L-alanine methyl ester (LAME) production. Reactor 5 (219) shall be used as a scrubber in operation and employed by Sources 208, 208C, and 202 only during their reaction/neutralization step.
8. Added Condition 4.1.2.10.3 to require specific emissions limits for particulate matter, VOC's, SO₂, and HAPs for undried LAME production.

Miscellaneous

Updated Condition 3.1.10 to include Permit Applications R13-0882J and R13-0882K.

40CFR64 Compliance Assurance Monitoring (CAM)

There has not been the addition of any pollutant-specific emission units that have potential pre-control device emissions of a regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

Non-Applicability Determinations

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

N/A

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: September 20, 2016
Ending Date: October 20, 2016

Point of Contact

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

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE

Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478
michael.egnor@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)

Not applicable.