

# Fact Sheet



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

Permit Number: **R30-03900692-2021**  
Application Received: **August 28, 2020**  
Plant Identification Number: **039-00692**  
Permittee: **ALTIVIA Services, LLC**  
Facility Name: **Institute Facility**  
Mailing Address: **250 Carbide Road**  
**Dunbar, WV 25064**

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Physical Location: Institute, Kanawha County, West Virginia  
UTM Coordinates: 432.0 km Easting • 4,248.310 km Northing • Zone 17  
Directions: The facility is located west of Institute, WV, adjacent to State Route 25 and West Virginia State University

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### Facility Description

The ALTIVIA Institute Facilities is comprised of ALTIVIA Services, LLC (Infrastructure – Title V groups 3A, 6, 7 and 8 of 8)) as well as ALTIVIA Ketones and Additives, LLC (Acetone Unit – Title V Group 2 of 8). However, the DAQ has assigned the entire facility as ALTIVIA Services, LLC with an ID number of 03900692. This facility was previously owned by Union Carbide Corporation (03900005) and the former Title V group numbers have been retained.

This Title V permit is for Group 8 of 8 and covers the site's boilers. There are currently two (2) natural gas fired boilers with a heat input of 350 MMBtu/hr and a steam output of 252,000 lb/hr per boiler. A third boiler of the same specifications has been included in the permit as a future option.

**Emissions Summary**

<b>Group 8 of 8 Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2019 Actual Emissions</b>
Carbon Monoxide (CO)	157	27.79
Nitrogen Oxides (NO <sub>x</sub> )	167	24.68
Particulate Matter (PM <sub>2.5</sub> )	23.01	1.26
Particulate Matter (PM <sub>10</sub> )	23.01	1.26
Total Particulate Matter (TSP)	23.01	1.26
Sulfur Dioxide (SO <sub>2</sub> )	2.65	0.51
Volatile Organic Compounds (VOC)	24.28	9.51
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2019 Actual Emissions</b>
Total HAPs	8.31	1.58

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

**Title V Program Applicability Basis**

This facility has the potential to emit over 100 TPY of CO, NO<sub>x</sub>, and SO<sub>2</sub>, as well as over 10 TPY of a single HAP and 25 TPY of total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, 10 TPY of a single HAP, and 25 TPY of aggregate HAPs, ALTIVIA Services, 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.
	45CSR10	SO <sub>2</sub> Air Emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction and Operating Permits
	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 Hazardous Air Pollutants
	45CSR40	Control of Ozone Season NO <sub>x</sub>

	40 C.F.R. Part 60 Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters
	40 C.F.R. Part 75 Subpart H	NOx Mass Emissions Provisions
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> )
R13-3111E	7/13/2018	

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**

The following changes have been made to the most recent version of this Permit:

- Boilerplate changes were made within sections 3.5.3, 3.5.5, and 3.5.6.
- The formerly reserved sections 4.0 and 5.0 were removed.
  - Section 6.0 and all associated cross-references were renumbered to section 4.0.
- 45CSR40 was changed in both 2016 and again in 2020.
  - The new language introduced was added in as condition 4.1.7.
  - The reference to 45CSR40 in condition 4.5.3 and its citation have been updated.

**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 64**

Boilers 16, 17, and 18 do not have any control devices. According to 40CFR§64.2(a)(2), CAM does not apply if the unit does not use a control device to achieve compliance with any emission limitation or standard.

**45CSR27**

This facility does not have any toxic air pollutant (TAP) emissions and is not subject to 45CSR27.

**45CSR7**

Since all 3 boilers are regulated by 45CSR2, they are exempt from 45CSR7 via 45CSR§7-10.1.

**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: November 20, 2020

Ending Date: December 21, 2020

**Point of Contact**

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

Nikki 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)**

N/A