

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**
Application Received: **April 4, 2017 (MM04) and April 7, 2017 (MM05)**
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: MM04 and MM05 Revised: October 30, 2017

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

Manufacture of various organic and specialty chemicals

SIC Codes: 2869; 2879

Emissions Summary

MM04: The following emissions are a result of an alternative operating scenario for producing Sodium Butyl Carbitol (HAP).

Regulated Pollutant	Change in permitted Emissions	
	lb/hr	lb/yr
Particulate Matter	0.10	20
VOC's	0.75	140

Regulated Pollutant	Change in permitted Emissions	
	lb/hr	lb/yr
Butyl Carbitol	0.05	20
Total HAPs	0.05	20

MM05: The following emissions are a result of increasing the number of batches of the Dried L-alanine methyl ester (LAME) process and identifying chromium emissions from the Catofin operating scenario.

Table 1: Catofin operating scenario

Regulated Pollutant	Change in permitted Emissions	
	lb/hr	lb/yr
Chromium Compounds	0.08	20
Total HAPs	0.08	20

Table 2: Dried L-alanine methyl ester (LAME)

Regulated Pollutant	Change in permitted Emissions	
	lb/hr	lb/yr
VOC's	0.42	20
SO ₂	- 19.12	-180
Acetonitrile	0.01	0
Hydrogen Chloride	-0.10	0
Methanol	0.01	0
Methyl Tert-Butyl Ether	0.38	20
PM	0.30	0
Total HAPs	0.30	20

Table 3: Undried LAME

Regulated Pollutant	Change in permitted Emissions	
	lb/hr	lb/yr
VOC's	- 0.82	0
SO ₂	- 1.90	0
Acetonitrile	0.01	0
Methanol	0.01	0
Methyl Tert-Butyl Ether	-0.84	0
PM	0.14	0
Total HAPs	-0.82	0

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:	45CSR6	Particulate Matter From Combustion
	45CSR7	Particulate Matter From Manufacturing Processes
	45CSR13	Permits for construction, modification, relocation, etc.
	45CSR30	Operating permit requirement.
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 (if any)
R13-0882P	August 1, 2017	

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

MM04 changes due to R13-0882O

1. Added Condition 4.1.2.14.1 to require that the dust collector 114 or 115 be employed by emission point 104.003A or 104.003B during all periods of the Sodium Butyl Carbitol process to minimize particulate emissions generated during periods in which the Reactor #3 or #6 Charge Hoppers are being operated.

2. Added Condition 4.1.2.14.2 to require that the incinerator (009) and incinerator scrubber (010) be used at emission point 104.014 during all periods of the Sodium Butyl Carbitol process. A limit for the total number of batches per year has also been added.
3. Added Condition 4.1.2.14.3 to require specific emissions limits for Particulate Matter, VOC's, and Butyl Carbitol (a HAP) for the Sodium Butyl Carbitol process. These limits are given in Table 4.1.2.14.3.
4. Added "R13-0882O" to Condition 3.1.10.
5. Added Emission Units 206PC, 206SC, 219C, SLM0056, SLM0071, and SLM0070 to the Emission Units Table.

MM05 changes due to R13-0882P

1. Updated the R13-0882 permit number and issuance date in Section 1.2.
2. Updated the page numbers in the Table of Contents.
3. Added "R13-0882P" to Condition 3.1.10.
4. Added Chromium Compound emissions of 0.08 lbs/hr and 20 lbs/yr for the Catofin Process given in Table 4.1.2.11.3.
5. Increased the number of batches of dried LAME and undried LAME from 10 to 20 in Conditions 4.1.2.9.2 and 4.1.2.10.2.
6. Revised emissions of VOC's, SO₂, Hydrogen Chloride, Acetonitrile, Methanol, Methyl Tert-Butyl Ether, and PM in Tables 4.1.2.9.4 and 4.1.2.10.3.
7. The dried LAME process has switched the existing dust collector (023) with a double cone dryer (117) due to the metal type in the dryer. Condition 4.1.2.9.3 and Table 4.1.2.9.4 have been revised accordingly.
8. The emission sources in Tables 4.1.2.9.4 and 4.1.2.10.3 for Emission Point ID 104.014 have been updated/corrected.
9. Condition 4.1.2.9.2 and the footnote to Table 4.1.2.9.4 have been revised to add additional emission sources.
10. The reference to Reactor 5 (219) has been removed from Condition 4.1.2.10.2 as the Main Scrubber (003) is now used to control these emissions. Reactor 5 has been removed from the footnote in Table 4.1.2.10.3. The footnote has been updated to reflect the Main Scrubber (003) and also to include additional emission points feeding to the scrubber.

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: 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 57th 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

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Charleston, WV 25304

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Response to Comments (Statement of Basis)

N/A