

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 this or Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 9, 2019.

Permit Number: **R30-03900011-2019**

Application Received: **March 16, 2023**

Plant Identification Number: **03-54-039-00011**

Permittee: **Clearon Corporation**

Facility Name: **South Charleston Chlorinated Dry Bleach Plant**

Mailing Address: **95 MacCorkle Avenue, South Charleston, WV 25303**

Permit Action Number: MM02 Revised: 10/24/2023

Physical Location:	South Charleston, Kanawha County, West Virginia
UTM Coordinates:	438.4 km Easting • 4,246.6 km Northing • Zone 17
Directions:	Exit 56 (Montrose Drive) on I-64. Turn right and go to the bottom of the hill and turn left at the light onto MacCorkle Avenue (Route 60). Go to 3 rd stop light and turn right. Turn left at first driveway.

Facility Description

Clearon's primary products are purified cyanuric acid and chlorinated isocyanurates also known as CDB. The facility operates on a year-round basis, 24 hours per day, and 365 days per year under SIC Code 2819.

Cyanuric acid is produced from the pyrolysis of urea. The cyanuric acid is used as the feed stock to produce various types of CDB's at the South Charleston Plant. CDB's are produced by chlorinating the cyanuric acid. Cyanuric acid is also sold to other manufacturers for the production of their chlorinated dry bleaches or as CDB stabilizers.

Cyanuric acid and chlorinated dry bleaches are used in production of swimming pool treatment chemicals, cleansers, dishwashing detergents, and various other products whose primary functions are cleaning, disinfecting, and sanitizing.

Emissions Summary

The equipment being added is spare equipment and will not be operated when the existing equipment is being operated. The design capacities of the spare equipment are equivalent to or less than the design capacities of the existing equipment. Therefore, there will be no increase in potential emissions as a result of this minor modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 408.73 tpy of NO_x. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Clearon Corporation 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	To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations.
	45CSR13	Construction permit requirement.
	45CSR30	Operating permit requirement.
State Only:	N/A	

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-1698B	05/16/2023	

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 purpose of this modification is to add redundant equipment to act as spares alongside existing equipment in the CDB-90 process. The changes were approved under R13-1698B.

The following changes were made to the Title V Permit:

- Section 1.0
 - “working cap” was removed from Emission Units T-915 and T-914’s Design Capacity.
 - The spare equipment was added as H-805, C-805, C-804, SC-909C, SC-909D, T-990, Y-980A, and Y-980B.
- Sections 2.0 and 3.0
 - The Title V Boilerplate was updated for conditions 2.1.3, 2.11.4, 2.17, 2.22, 3.5.3, 3.5.4, 3.5.7, 3.5.8.a.1, and 3.5.8.a.2.
 - The R13-1698B citation was updated for Title V condition 3.1.11.
- Section 9.0
 - Conditions 9.1.8 – 9.1.10 were added for the equipment that will be used as spares.
 - Condition 9.4.2 was revised to include production from the redundant equipment being used as spares.
 - Condition 9.4.7 was added to include recordkeeping for when the redundant equipment is operated.

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: Not applicable for minor modifications
Ending Date: N/A

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 57th Street SE
Charleston, WV 25304
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)

Not applicable.