

# 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 Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 26, 2022.

Permit Number: **R30-05300054-2022**  
Application Received: **March 10, 2025**  
Plant Identification Number: **03-54-05300054**  
Permittee: **APG Polytech, LLC**  
Facility Name: **Apple Grove**  
Mailing Address: **State Rte. 2 Apple Grove, WV 25502-0088**

Permit Action Number: *MM02*      Revised: *October 28, 2025*

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|                    |                                                                                                            |
|--------------------|------------------------------------------------------------------------------------------------------------|
| Physical Location: | Apple Grove, Mason County, West Virginia                                                                   |
| UTM Coordinates:   | 397.86 km Easting • 4,279.97 km Northing • Zone 17                                                         |
| Directions:        | WV Route 2, approximately thirteen miles south of Point Pleasant and thirty miles north of Huntington, WV. |

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### **Facility Description**

APG Polytech, LLC manufactures polyester resin and handles the final product in bagging/packaging, storage, and loading facilities. Infrastructure and support facilities are also located at the site and include boilers, wastewater treatment, warehouses, maintenance shops, and laboratories. SIC code: 2821.

This minor modification is based on permit R13-1650W and covers an update to the testing and monitoring requirements for the Direct Fire Thermal Oxidizer (DFTO) system (Control Device ID DFTO-1C).

## Emissions Summary

This modification didn't result in any emission changes.

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 26.19 tpy of Ethylene Glycol and 38.03 tpy of aggregate HAPs. Due to this facility's potential to emit over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, APG Polytech, 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.

The modification to this facility has been found to be subject to the following applicable rules:

|                    |         |                                                                                        |
|--------------------|---------|----------------------------------------------------------------------------------------|
| Federal and State: | 45CSR6  | Control of Air Pollution From Combustion of Refuse                                     |
|                    | 45CSR13 | Permits for construction, modification, relocation and operation of stationary sources |
|                    | 45CSR30 | Operating permit requirement.                                                          |

State Only:                      None

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<br>Consent Order Number | Date of<br>Issuance | Permit Determinations or Amendments That<br>Affect the Permit ( <i>if any</i> ) |
|-----------------------------------|---------------------|---------------------------------------------------------------------------------|
| R13-1650W                         | April 18, 2025      |                                                                                 |

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**

Current permit term 4.3.9 requires that APG perform a stack test on the Thermal Oxidizer (Control Device ID DFTO-1C) to determine the destruction efficiency. After APG's consultation with a stack testing contractor, the contractor indicated that due to the integrated design of the OSC/DFTO system, determining the efficiency of the DFTO would be extremely difficult. Therefore, determination of the efficiency of the DFTO was changed to a performance standard of 130 ppm. This value will demonstrate that the control device is working. Also, weekly emission checks (Method 22) for the DFTO in condition 4.2.8.b were reduced to monthly visible emission checks (after three months with no visible emissions). Below is a description of all the changes and corrections to the permit:

1. Emission Units Table 1.1 – Emission Point ID for the Thermal Oxidizer (Control Device ID DFTO-1C) was corrected from “4P-1800” to “4P-2800”.
2. Section 3.0 – permit boilerplate conditions 3.1.6 and 3.3.1 were updated.
3. Section 4.0 - conditions 4.1.11 (Table 4.1.11.b and citation), 4.1.12 (citation), 4.1.13 (citation), 4.1.14 (citation), 4.2.8.b and 4.3.9 were revised to reflect changes in the permit R13-1650W:
  - condition 4.1.11 (Table 4.1.11.b and citation) - Emission Point ID for the Thermal Oxidizer (Control Device ID DFTO-1C) was corrected from “4P-1800” to “4P-2800”;
  - conditions 4.1.12 (citation), 4.1.13 (citation) and 4.1.14 (citation) - Emission Point ID for the Thermal Oxidizer (Control Device ID DFTO-1C) was corrected from “4P-1800” to “4P-2800”;
  - condition 4.2.8.b - the following statement was added: “After three consecutive months of no visible emissions from the DFTO, visible emission checks may be reduced from once each seven (7) day period to once per month”;
  - condition 4.3.9 - the following statement was added: “Due to the integrated design of the DFTO, determining the efficiency is not practical. Therefore, compliance with the 99% VOC destruction shall be demonstrated through a performance standard of 130 ppm VOC. The VOC emissions measured during the initial stack test shall not exceed 130 ppm.”

### **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

### **Point of Contact**

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

Natalya V. Chertkovsky  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/926-0499 ext. 41250  
natalya.v.chertkovsky@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.