



west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Phone: 304/926-0475 • Fax: 304/926-0479

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

Evaluation Memo

Application Number: R13-1517C
Facility ID Number: 039-00003
Name of Applicant: Union Carbide Corporation
Name of Facility: South Charleston Facility
Application Type: Class I Administrative Update
Received Date: March 10, 2015
Complete Date: March 10, 2015
Due Date: May 19, 2015
Permit Writer: Laura Jennings



Requested Changes

A Class I Administrative Update is requested for the following changes:

- Route Tank 8382 vent (Emission Point ID T8382) to the Specialty Surfactants Plant water scrubber (Equipment ID 8130, Emission Point ID E-1081-3). The requested permit revision meets Class I administrative update criteria for a change in emission point with a decrease of emissions (Regulation 13, Section 4.2.a.8.). The change is planned for implementation during the 2nd or 3rd quarter of 2015.
- Update of Tank Volumes

Tank 8330, 8340 and Tank 8382 Discussion:

The material stored in Tank 8330 is a non-VOC liquid. There are no emissions of regulated pollutants from Tank 8330. Tank 8330 vent is routed to the air. Change is incorporated in the updated Emission Units table.

Tank 8340 vent is routed to the process scrubber system. The emission point identification number in Table 4.1.1. of Condition 4.1.1 needs to be changed to E-1081-3.

The material processed through T8382 is a heavy, non-HAP organic liquid. The tank currently vents to the air. Routing T8382 vent to the scrubber will result in a decrease of volatile organic compound emissions. Estimated maximum VOC loading to the scrubber for Tank 8382 is less than 0.02 lb/hr and 2.0 lbs/yr. The material is slightly soluble in water and will be removed from the vent stream by the water scrubber. There will be no change in currently permitted VOC emissions for Emission Point E-1081-3.

Tank Volume Updates Discussion:

Tank volumes were recently checked for accuracy. The current permit lists rounded numerical tank volumes are requested to be consistent with refined engineering calculations. There are no changes in permitted emissions or applicable requirements.

The proposed changes affect R13-1517B, Section 1.0 - Emission Units and Condition 4.1.1, Table 4.1.1.

Regulatory Discussion

The applicant meets the requirements for a Class I Administrative Update and has demonstrated compliance with the requirements by submitting a complete permit application.

Updates to R13-1517B

- General Updates were made to reflect current permit revision
- The boilerplate was updated to the current format because the current permit was not available electronically
- Emission Units Table, Section 1.0 was updated as follows:
 - ▶ The design capacity was updated for the following tanks: 8310, 8330, 8340, 8353, 8363, 8370, 8528, 8621, 8540, 8314, 8320, 8321, 8322, 8323, 8324, 8331, 8332, 8333, 8334, 8341, 8343, 8344, 8345, 8346, 8350, 8351, 8352, 8354, 8355, 8356, 8360, 8361, 8362, 8364, 8371, 8372, 8373, 8380, 8381, 8382, 8383, 8390, 8391, 8393, 8420, 8520, 8817, 8835
 - ▶ Tank 8330 updated the emission point ID from E-1081-3 to T-8330 and changed the Control Device from C-8110 and C-8130 to NA
 - ▶ Tank 8340 updated the emission point ID from T8340 to E-1081-3
 - ▶ Tank 8382 updated the emission point ID from T-8382 to E-1081-3 and changed the Control Device from NA to C-8130
- Table 4.1.1 was updated to remove emission point ID T-8382 and to add T-8330 as a "no regulated pollutant" entry

Recommendation to Director

Based on the information provided in the Class I Administrative Update application, Union Carbide Corporation, South Charleston Facility located in Kanawha County, WV will be in compliance with the applicable state and federal regulations by demonstrating compliance with the permit. Therefore, it is recommended that permit R13-1517C be issued.