



Steve
13-3025A
0391-0000

Union Carbide Corporation
A Subsidiary of The Dow Chemical Company
P.O. Box 8361
437 MacCorkle Avenue, SW
South Charleston, WV 25303
USA

CERTIFIED MAIL – RETURN RECEIPT REQUESTED
#7012 2920 0000 2036 5991

January 28, 2015

Mr. William F. Durham, Director
WVDEP Division of Air Quality
601 57th Street
Charleston, WV 25304

JAN 29 2015

Dear Mr. Durham,

Attention: Mr. Steve Pursley

**RE: UNION CARBIDE CORPORATION (UCC) – SOUTH CHARLESTON FACILITY
REGULATION 13 PERMIT NUMBER: R13-3025
GROUNDWATER/SOIL REMEDIATION – MIDDLE ISLAND SECOND SOURCE
REGULATION 13 CLASS I ADMINISTRATIVE UPDATE REQUEST**

This letter serves as a request for a Class I Administrative Update to permit no. R13-3025, for groundwater/soil remediation activities located at South Charleston Plant. The proposed changes do not involve regulatory applicability determinations, or changes associated with decreased monitoring, recordkeeping, or reporting requirements. The following changes are being requested:

1. Section 1.0 (Emissions Units):
 - a. UCC requests that the emission point ID for Middle Island Source groundwater/soil remediation process be changed from "MI2CO" to "MI2SVE2",
 - b. UCC requests that the Year Installed date be changed from "2013" to "2014",
 - c. UCC requests that the design capacity of the groundwater/soil remediation process be changed from "2,000 scfm" to "1,000 scfm".
 - d. The catalytic oxidizer is the control device for the groundwater/soil remediation process, and is designated as "MI2CO". UCC requests that "MI2CO" be added for clarification.

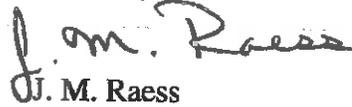
Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
MI2VE	MI2CO MI2VE2	Vapor Extraction System	2013 2014	2000 1000 scfm	Catalytic Oxidizer (MI2CO)

2. Condition 4.1.4.1. states that the temperature monitoring shall be performed at the combustion chamber inlet. Based on manufacturer's recommendations, the temperature is currently monitored at the actual combustion chamber. UCC requests that the monitoring requirement be changed to "combustion chamber".

4.1.4.1. The catalytic oxidizer shall be operated with a combustion chamber ~~inlet~~ temperature of at least the temperature at which compliance with the VOC emission limits in 4.1.2 of this permit will be demonstrated during the stack testing required by section 4.2 of this permit at all times when the contaminated vent gas is being combusted. Until the initial performance test is performed, the catalytic oxidizer shall be operated with a combustion chamber inlet temperature of at least 600°F or the manufacturers minimum recommended temperature. Compliance with this requirement shall be based on a daily average.

If you have any questions regarding this notification, please contact Toby Scholl at (304) 747-5619.

Sincerely yours,



J. M. Raess

WVO Responsible Care Leader

Attachment

cc: Ms. Zelma Maldonado
U.S. EPA Region 3
Air Protection Division (3AP20)
1650 Arch Street
Philadelphia, PA 19103-2029