



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

Joe Manchin, III, Governor
Stephanie R. Timmermeyer, Cabinet Secretary
www.wvdep.org

MEMORANDUM

To: Bev McKeone, NSR Program Manager

From: Caraline Griffith, Engineer Trainee

Date: June 8, 2015

Subject: PD15-044, Solutia, Inc. Nitro Facility

On May 13, 2015, DAQ received a permit determination request from Solutia, Inc. to request an installation of a pump and treatment system for removing and treating groundwater that is contained within soil-bentonite containment walls on site.

45CSR13 has a De Minimis Source classification that includes the operation of groundwater remediation wells, including emissions from the pumps and collection activities. It does not include emissions from air-stripping treatment or storage. Air stripping is defined as the transferring of volatile components of a liquid into an air stream. Because this treatment facility uses an oxidation process which achieves air stripping of VOCs, it cannot be deemed automatically a De Minimis Source. The air-stripping is occurring through an aeration system/tank that utilizes a blower that pulls fresh air into the aeration tank to assure the iron is oxidized. During this process air emissions are coincidentally produced because the blower will be pulling fresh air into the aeration tanks by evacuating air from the tank through emission points.

45CSR13 defines the term “stationary source” as any building, structure, facility, installation, or emission unit or combination thereof that discharges or has the potential to discharge more than six (6) pounds per hour and ten (10) tons per year, or has the potential to discharge more than 144 pounds per calendar day, of any regulated air pollutant and more than two (2) pounds per hour or five (5) tons per year of hazardous air pollutants considered on an aggregated basis.

The potential emissions, attached, are not above threshold limits and there are no substantive requirements triggered so the source is not considered a stationary source, and therefore, in this case, does not require an air permit.

Regulated Pollutants	Total Emissions	
	lb/hr	TPY
PM/PM10/PM2.5	0.16894	0.44314
VOC	0.13044	0.34465
VOC HAP	0.06772	0.17887
Metal HAP	0.00913	0.02395
Total HAP	0.07685	0.20282
TCDD	3.64E-09	9.56E-09