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Union Carbide Corporation
A Subsidiary of The Dow Chemical Company
P.O. Box 8004
437 MacCorkle Avenue, SW
South Charleston, WV 25303
USA

May 12, 2015

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

Dear Mr. Durham,

Attn: Ms. Carrie McCumbers
Title V Permit Program Manager

RE: UNION CARBIDE CORPORATION (UCC) – TECHNOLOGY PARK OPERATIONS
REGULATION 30 PERMIT RENEWAL APPLICATION
TITLE V PERMIT NUMBER: R30-0390004-2010 (Group 2)

In accordance with Condition 2.3.2., of Permit R30-03900004-2010, enclosed is an application to renew the air operating permit. A copy of the application is provided on two separate Read Only CD_ROM diskettes with the exception of printed copies of the General Application Form that requires signature.

Attachment 1, Table of Contents, describes application layout and construction.

Section 14, Facility Description of the General Form, provides a narrative of the changes proposed in this renewal application.

If you have any questions regarding the application, please contact me at (304) 747-3713 or via email at sizemofa2@dow.com.

Sincerely yours,

Freddie A. Sizemore
EHS Regulatory Affairs Specialist

Attachments

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

Union Carbide Corporation Technology Park Operations: Non R&D Operations
Regulation 30 Permit Renewal Application
May 2015

Attachment 1
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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475

www.dep.wv.gov/daq

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Group 2 - Non R&D

Section 1: General Information

Form with 10 sections: 1. Name of Applicant (Union Carbide Corporation), 2. Facility Name (Technology Park Operations), 3. DAQ Plant ID No. (099-00004), 4. Federal Employer ID No. (131421730), 5. Permit Application Type (Renewal), 6. Type of Business Entity (Corporation), 7. Is the Applicant the: (Both), 8. Number of onsite employees (145), 9. Governmental Code (Privately owned), 10. Business Confidentiality Claims (No).

11. Mailing Address		
Street or P.O. Box: P. O. Box 8361		
City: South Charleston	State: WV	Zip: 25303-
Telephone Number: (304) 747-2205	Fax Number: (304) 747-3147	

12. Facility Location		
Street: 1840 Union Carbide Drive	City: South Charleston	County: WV
UTM Easting: 438.694 km	UTM Northing: 4,245.163 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
Directions: From Charleston, WV take Interstate I-64 west toward Huntington. Take Kanawha Turnpike Exit. Proceed approximately 1/ mile to West Virginia Regional Technology Park. UCC Technology Park Operations are located at the West Virginia Regional Technology Park.		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, for what air pollutants?	
Is facility located within 50 miles of another state? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the affected state(s). Ohio Kentucky	
Is facility located within 100 km of a Class I Area¹? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If no, do emissions impact a Class I Area¹? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, name the area(s).	
¹ Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.		

13. Contact Information		
Responsible Official: Jonathan M. Raess		Title: WVO Responsible Care Leader
Street or P.O. Box: P. O. Box 8361		
City: South Charleston	State: WV	Zip: 25303-
Telephone Number: (304) 747-2205	Fax Number: (304) 747-3147	
E-mail address: JMRaess@dow.com		
Environmental Contact: Freddie A. Sizemore		Title: EHS Regulatory Affairs Specialist
Street or P.O. Box: P. O. Box 8361		
City: South Charleston	State: WV	Zip: 25303-
Telephone Number: (304) 747-3713	Fax Number: (304) 747-3147	
E-mail address: sizemofa2@dow.com		
Application Preparer: Not applicable		Title:
Company:		
Street or P.O. Box:		
City:	State:	Zip: -
Telephone Number: () -	Fax Number: () -	
E-mail address:		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Holz Impoundment	None	325199	2869

Provide a general description of operations.

UCC Technology Park Operations (TPO) is located at the West Virginia Regional Technology Park (WVRTP). UCC facilities include research and development laboratories, pilot plant operations and supporting offices. The Bulk Gas Area provides chemical storage for R&D operations. UCC operations also include a surface impoundment (Holz Impoundment) managed and operated by the Union Carbide Corporation South Charleston Facility. Holz Impoundment is used for disposal of grit, sludge, and other waste water solids from the City of South Charleston Waste Treatment Works and sewer cleanouts from the City of South Charleston, and UCC South Charleston and Technology Park.

Group 1 of 2 Title V Permit (for R&D Operations) was issued January 26, 2010. A complete renewal application has been filed with WVAQ and is pending Agency review.

Group 2 of 2 Title V Permit (for non-R&D Operations – Environmental Operations, Shared Services/Energy Systems) was issued December 1, 2010. As the result of asset transfers, as discussed in more detail below, only requirements related to Environmental Operations (Holz Impoundment) remain applicable.

Proposed Permit/Permit Application Deletions.

Most emission units listed in Shared Services/Energy Systems of Group 2 of 2, Section 1.0, Table 1.1 are no longer under the ownership or operational control of UCC.

UCC assets transfer to WVRTP, included the following emission units which had no applicable requirements:

704 Additive Storage Tank #1

704 Additive Storage Tank #2

742 Additive Storage Tank

2000 Additive Storage Tank

6000 Additive Storage Tank

B2000 Propane Powered Emergency Electrical Generator

B740 Propane Powered Emergency Electrical Generator

UCC requests that these emissions units be deleted from Section 1.0, Table 1.1. See Exhibit A Draft Permit Conditions Marked Revisions.

Assets listed in Shared Services/Energy Systems of Section 1.0, Table 1.1., for two Building 6000 Diesel Fueled Emergency Electrical Generators and supporting equipment (Permit R13-2082) were transferred to OODA, LLC. A copy of WVDAQ's letter noting acknowledgement of transfer dated June 11, 2012 is provided as Exhibit B.

Applicable requirements for the B6000 generators and supporting equipment were listed in Section 4.0 Source-Specific Requirements (Shared Services/Energy Systems). Transferred emission units were:

B6000 Diesel Storage Tank

B6000 Diesel Feed Tank #1

B6000 Diesel Feed Tank #2

B6000 Diesel Powered Emergency Generator (Emission Unit ID GV7)

B6000 Diesel Powered Emergency Generator (Emission Unit ID GV8)

UCC requests that these emissions units be deleted from Section 1.0, Table 1.1 and Section 4.0 Source-Specific Requirements. See Exhibit A Draft Permit Conditions Marked Revisions.

14. Facility Description, Provide a general description of operations. (continued)

Proposed Permit Revisions.

Section 5.0 Source Specific Requirements (Environmental Operations)

Condition 5.1.3 of the current operating permit provides “Trucks hauling bottom ash to the impoundment area shall be covered”. The coal fired boiler at the UCC South Charleston Plant was permanently shut down in November of 2012. Bottom ash is no longer trucked to Holz Impoundment. UCC requests revision of Condition 5.1.3 to reflect this change.

Condition 5.1.4 of the current operating permit provides that a notification pursuant to §40 CFR63.6645 for a diesel fueled pump was required on or before February 16, 2011. The pump was removed from the site in 2010. This provision needs to be deleted at permit removal.

See Exhibit A Draft Permit Conditions Marked Revisions for proposed changes identified above.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to “Plot Plan - Guidelines.”

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

See Item 20, General Application Form of Group 1 of permit renewal application (R&D Operations) submitted by cover letter dated July 25, 2014.

Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See Item 20, General Application Form of Group 1 of permit renewal application (R&D Operations) submitted by cover letter dated July 25, 2014.

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	38
Nitrogen Oxides (NO _x)	11
Lead (Pb)	
Particulate Matter (PM _{2.5}) ¹	1
Particulate Matter (PM ₁₀) ¹	1
Total Particulate Matter (TSP)	1
Sulfur Dioxide (SO ₂)	0.1
Volatile Organic Compounds (VOC)	128
Hazardous Air Pollutants ²	Potential Emissions
Chloroform	0.5
1,4-Dioxane	1.4
Hexane	0.5
Methanol	2
Styrene	1.3
Toluene	0.5
Other Miscellaneous HAPs	1
Regulated Pollutants other than Criteria and HAP	Potential Emissions

¹PM_{2.5} and PM₁₀ are components of TSP.
²For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)	
<input type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input type="checkbox"/>	7. Blacksmith forges.
<input type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input checked="" type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
<input checked="" type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input type="checkbox"/>	18. Emergency road flares.
<input type="checkbox"/>	19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO _x , SO ₂ , VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis: _____ _____ _____ _____ _____ _____ _____ _____

24. Insignificant Activities (Check all that apply)

<input type="checkbox"/>	<p>20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
<input checked="" type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input type="checkbox"/>	26. Fire suppression systems.
<input type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input checked="" type="checkbox"/>	29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
<input type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input checked="" type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input checked="" type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
<input checked="" type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input type="checkbox"/>	51. Steam cleaning operations.
<input type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input type="checkbox"/>	54. Steam vents and safety relief valves.
<input type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input checked="" type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table
Fill out the Title V Equipment Table and provide it as ATTACHMENT D .
26. Emission Units
For each emission unit listed in the Title V Equipment Table , fill out and provide an Emission Unit Form as ATTACHMENT E .
For each emission unit not in compliance with an applicable requirement, fill out a Schedule of Compliance Form as ATTACHMENT F .
27. Control Devices
For each control device listed in the Title V Equipment Table , fill out and provide an Air Pollution Control Device Form as ATTACHMENT G .
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the Compliance Assurance Monitoring (CAM) Form(s) for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as ATTACHMENT H .

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Jonathan M. Raess

Title: WVO Responsible Care Leader

Responsible official's signature:

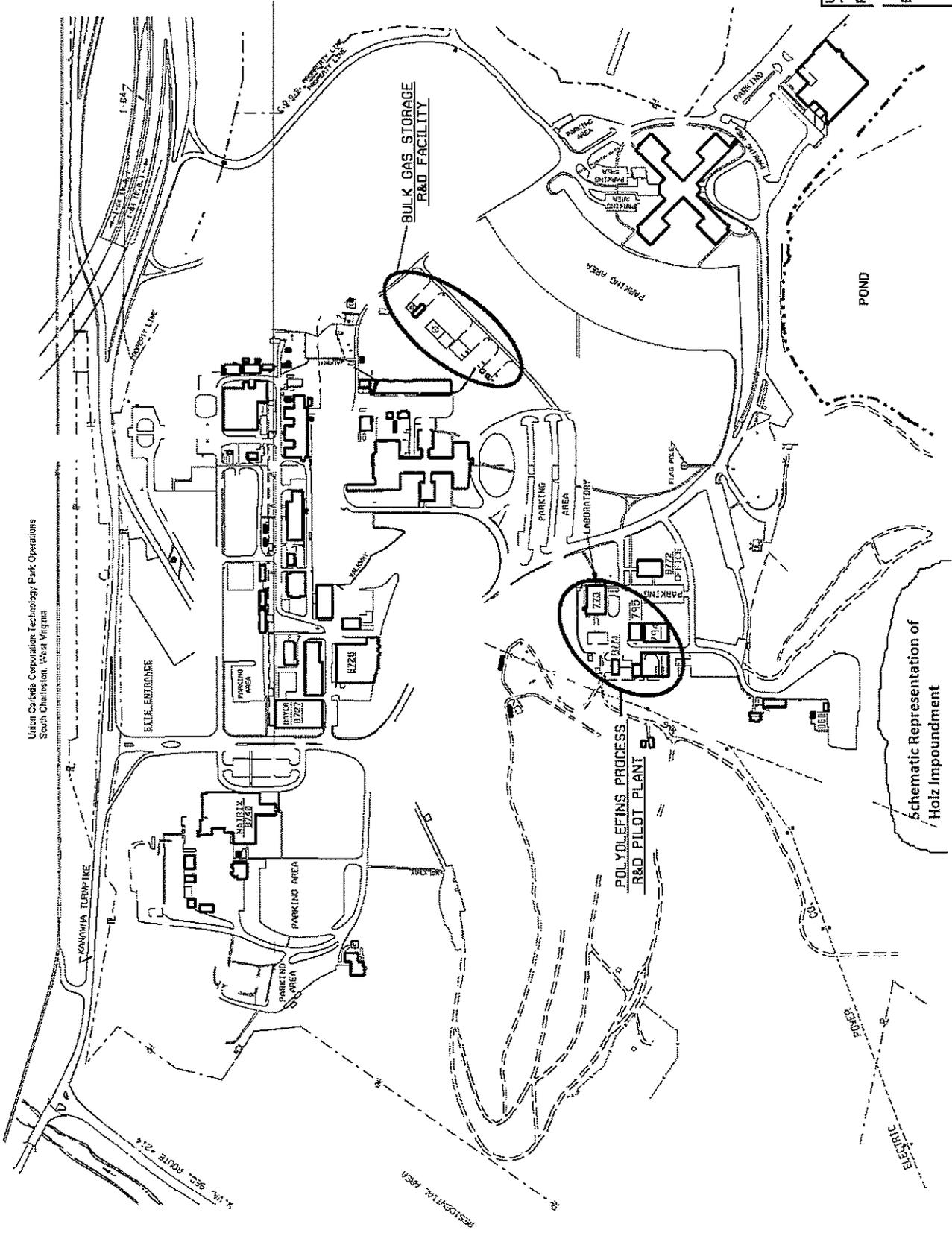
Signature: Jonathan M. Raess Signature Date: 5/12/15
 (Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:

<input checked="" type="checkbox"/>	ATTACHMENT A: Area Map
<input checked="" type="checkbox"/>	ATTACHMENT B: Plot Plan(s)
<input checked="" type="checkbox"/>	ATTACHMENT C: Process Flow Diagram(s)
<input checked="" type="checkbox"/>	ATTACHMENT D: Equipment Table
<input checked="" type="checkbox"/>	ATTACHMENT E: Emission Unit Form(s)
<input type="checkbox"/>	ATTACHMENT F: Schedule of Compliance Form(s)
<input type="checkbox"/>	ATTACHMENT G: Air Pollution Control Device Form(s)
<input type="checkbox"/>	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

All of the required forms and additional information can be found and downloaded from, the DEP website at www.dep.wv.gov/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

Union Carbide Corporation Technology Park Operations
South Charleston, West Virginia

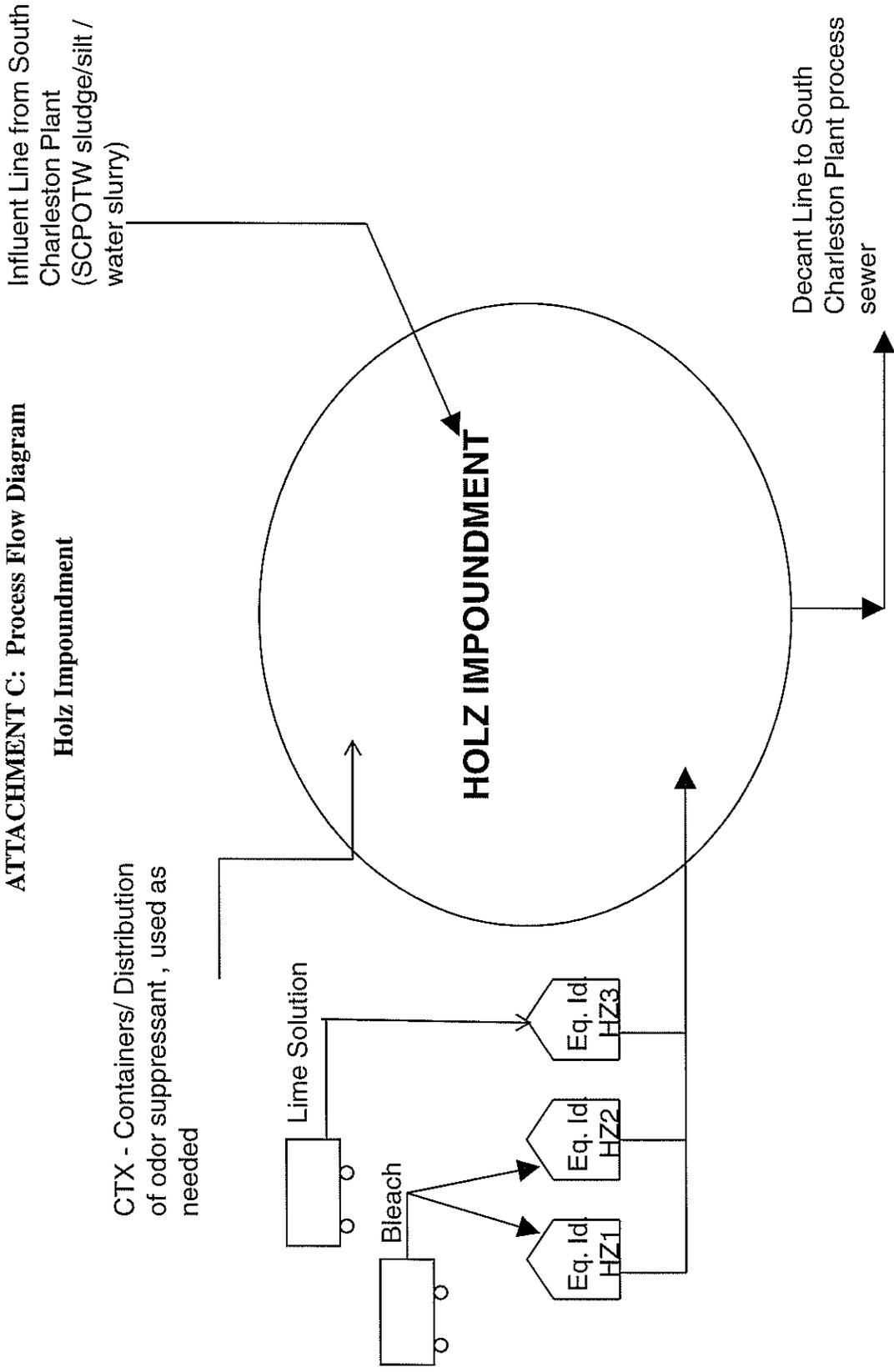


Union Carbide Corporation
Technology Park Operations
R30 Renewal Application
2015
Buildings/Operating Groups

Schematic Representation of
Hoiz Impoundment

ATTACHMENT C: Process Flow Diagram
Holz Impoundment

CTX - Containers/ Distribution
of odor suppressant, used as
needed



ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: Holz Impoundment	Emission unit name: Holz Impoundment	List any control devices associated with this emission unit: Not applicable
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
 Impoundment receives water-solid slurry from South Charleston Publicly Owned Treatment Works and silt from SCP water treating plant. Lime solution, bleach solution and an odorant suppressant are used as processing aids.

Manufacturer:	Model number:	Serial number:
Construction date: 1972	Installation date: 1972	Modification date(s): MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
Not applicable

Maximum Hourly Throughput: Not applicable	Maximum Annual Throughput: Not applicable	Maximum Operating Schedule: Not applicable
---	---	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___Yes ___X___ No	If yes, is it? ___ Indirect Fired ___ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		13
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Acetonitrile		1
Chloroform		0.5
1,4-dioxane		1.4
Styrene		1.3
Toluene		0.2
Other Miscellaneous HAPs		1
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>Engineering estimate. Reference: AP-42--§4.13 Wastewater Collection, Treatment, and Storage.</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

From Current Regulation 30 Operating Permit (R30-03900004-2006-SM02)

Condition 5.1.1. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.

[45CSR§7-5.1 (Holz Impoundment)]

Condition 5.1.2. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.

[45CSR§7-5.2 (Holz Impoundment)]

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Modified From Current Regulation 30 Operating Permit (R30-03900004-2010)

Condition 5.1.3. Compliance with then above applicable requirements will be demonstrated by maintaining paved or graveled roads to the impoundment area. ~~Trucks hauling bottom ash to the impoundment area will be covered.~~

[45CSR§30-5.1.c (Holz Impoundment)]

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: HZ1	Emission unit name: Storage Tank	List any control devices associated with this emission unit: Not applicable
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Storage of non-VOC/Hazardous Air Pollutant material. Material (bleach) is received in tank trucks.

Manufacturer:	Model number:	Serial number:
----------------------	----------------------	-----------------------

Construction date: 1999	Installation date: 1999	Modification date(s): MM/DD/YYYY
-----------------------------------	-----------------------------------	--

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
Approximately 14,000 gallons

Maximum Hourly Throughput: Not applicable	Maximum Annual Throughput: Not applicable	Maximum Operating Schedule: Not applicable
---	---	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___Yes <input checked="" type="checkbox"/> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
--	--

Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
--	---

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data			
Criteria Pollutants	Potential Emissions		
	PPH	TPY	
Carbon Monoxide (CO)			
Nitrogen Oxides (NO _x)			
Lead (Pb)			
Particulate Matter (PM _{2.5})			
Particulate Matter (PM ₁₀)			
Total Particulate Matter (TSP)			
Sulfur Dioxide (SO ₂)			
Volatile Organic Compounds (VOC)			
Hazardous Air Pollutants	Potential Emissions		
	PPH	TPY	
Regulated Pollutants other than Criteria and HAP	Potential Emissions		
	PPH	TPY	

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

None

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: HZ2	Emission unit name: Storage Tank	List any control devices associated with this emission unit: Not applicable
--	--	---

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Storage of non-VOC/Hazardous Air Pollutant material. Material (bleach) is received in tank trucks.

Manufacturer:	Model number:	Serial number:
----------------------	----------------------	-----------------------

Construction date: 1999	Installation date: 1999	Modification date(s): MM/DD/YYYY
-----------------------------------	-----------------------------------	--

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
Approximately 14,000 gallons

Maximum Hourly Throughput: Not applicable	Maximum Annual Throughput: Not applicable	Maximum Operating Schedule: Not applicable
---	---	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___Yes <u>X</u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
---	--

Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
--	---

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data			
Criteria Pollutants	Potential Emissions		
	PPH	TPY	
Carbon Monoxide (CO)			
Nitrogen Oxides (NO _x)			
Lead (Pb)			
Particulate Matter (PM _{2.5})			
Particulate Matter (PM ₁₀)			
Total Particulate Matter (TSP)			
Sulfur Dioxide (SO ₂)			
Volatile Organic Compounds (VOC)			
Hazardous Air Pollutants	Potential Emissions		
	PPH	TPY	
Regulated Pollutants other than Criteria and HAP	Potential Emissions		
	PPH	TPY	
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p>			

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

None

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: HZ3	Emission unit name: Storage Tank	List any control devices associated with this emission unit: Not applicable
--	--	---

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Storage of non-VOC/Hazardous Air Pollutant material. Material (lime solution) is received in tank trucks.

Manufacturer:	Model number:	Serial number:
----------------------	----------------------	-----------------------

Construction date: 2014	Installation date: 2014	Modification date(s): MM/DD/YYYY
-----------------------------------	-----------------------------------	--

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
Approximately 10,150 gallons

Maximum Hourly Throughput: Not applicable	Maximum Annual Throughput: Not applicable	Maximum Operating Schedule: Not applicable
---	---	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <u> X </u> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
--	--

Maximum design heat input and/or maximum horsepower rating:	Type and Btu/hr rating of burners:
--	---

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

<i>Emissions Data</i>			
Criteria Pollutants	Potential Emissions		
	PPH	TPY	
Carbon Monoxide (CO)			
Nitrogen Oxides (NO _x)			
Lead (Pb)			
Particulate Matter (PM _{2.5})			
Particulate Matter (PM ₁₀)			
Total Particulate Matter (TSP)			
Sulfur Dioxide (SO ₂)			
Volatile Organic Compounds (VOC)			
Hazardous Air Pollutants	Potential Emissions		
	PPH	TPY	
Regulated Pollutants other than Criteria and HAP	Potential Emissions		
	PPH	TPY	
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p>			

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

None

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

**Exhibit A – Draft Permit
Marked Revisions to Current Permit Conditions**

Union Carbide Corporation
Technology Park Operations
South Charleston, West Virginia

Group 2 of 2
(Environmental Operations, Shared Services/Energy Systems)
R30-03900004-2010 Renewal Application

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Environmental Operations					
Holz Impoundment	None	Holz Impoundment	1972	Not Applicable	
HZ1	1HZ	Tank	1999	14,000 gal	
HZ2	2HZ	Tank	1999	14,000 gal	
<u>HZ3</u>	<u>3HZ</u>	<u>Tank</u>	<u>2014</u>	<u>10,150 gal</u>	
ST4	TV4	730 Additive Storage Tank	Not applicable	< 1,000 gal	
Shared Services/Energy Systems					
ST2	TV2	704 Additive Storage Tank #1	not applicable	1,500 gallons	
ST7	TV7	704 Additive Storage Tank #2	not applicable	1,000 gallons or less	
STC	TVC	742 Additive Storage Tank	not applicable	1,000 gallons or less	
STD	TVD	770 Additive Storage Tank	not applicable	1,000 gallons or less	
STG	TVG	2000 Additive Storage Tank	not applicable	1,000 gallons or less	
STH	TVH	6000 Additive Storage Tank	not applicable	1,000 gallons or less	
STI	TVI	B6000 Diesel Storage Tank	1997	8,000 gallons	
STJ	TVJ	B6000 Diesel Feed Tank #1	1997	100 gallons	
STL	TVL	B6000 Diesel Feed Tank #2	1997	100 gallons	
EG1	GV1	B2000 Propane Powered Emergency Electrical Generator	not applicable	11.5kW	
EG4	GV4	B740 Propane Powered Emergency Electrical Generator	not applicable	4.5 kVA	
EG7	GV7	B6000 Diesel Powered Emergency Electrical Generator	1997	1,100 kW	
EG8	GV8	B6000 Diesel Powered Emergency Electrical Generator	1997	1,100 kW	

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-2082A	4/10/2003
<u>None</u>	

3.0 Facility-Wide Requirements

3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

45CSR27 – To Prevent and Control the Emissions of Toxic Air Pollutants

The emissions of toxic air pollutants at the facility are lower than the threshold values in 45CSR27 Table A, so the facility is not subject to Best Available Technology requirements.

~~45CSR34— 40 C. F. R. Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines~~

~~The Union Carbide Corporation's Technology Park Operations Building 6000 diesel fuel generators are for emergency use and are exempt from rule provisions.~~

40 C.F.R. Part 64 - The Union Carbide Corporation's Technology Park Operations Environmental Operations and Shared Services/Energy Systems are not subject to the Compliance Assurance Monitoring (CAM) rule because the Group 2 of 3 Permit has no emission sources with a precontrol device PTE of 100TPY of any criteria pollutant.

4.0 Source-Specific Requirements Reserved [~~Shared Services/Energy Systems~~]

4.1. — Limitations and Standards

- 4.1.1. — ~~Diesel fuel will be burned as the primary fuel in the two (2) emergency electricity generators. [45CSR13, Permit No. R13-2082 — (Condition A.1.) (GV7, GV8)]~~
- 4.1.2. — ~~The maximum sulfur content for the diesel fuel to be burned in the generator engines shall not exceed 0.5%. [45CSR13, Permit No. R13-2082 — (Condition A.2.) (GV7, GV8)]~~
- 4.1.3. — ~~The maximum diesel fuel feed rate to each generator engine shall not exceed 74.1 gallons per hour. [45CSR13, Permit No. R13-2082 — (Condition A.3.) (GV7, GV8)]~~
- 4.1.4. — ~~Operation of the two generators is to be limited to 750 hours per year per generator. [45CSR13, Permit No. R13-2082 — (Condition A.4.) (GV7, GV8)]~~
- 4.1.5. — ~~The maximum allowable emissions to the atmosphere from the electricity generators are not to exceed the following limitations:~~

Regulated Pollutant	Maximum Emission Rate			
	Generator No. 1 (Emission Point ID No. GV7)		Generator No. 2 (Emission Point ID No. GV8)	
	(lb/hr)	(ton/yr) [†]	(lb/hr)	(ton/yr) [†]
CO	6.11	2.29	6.11	2.29
Hydrocarbons	1.14	0.43	1.14	0.43
NO _x	38.07	14.28	38.07	14.28
PM	0.78	0.29	0.78	0.29
PM ₁₀	0.58	0.22	0.58	0.22
SO ₂	5.13	1.92	5.13	1.92

^(†) — Based on 750 hours of operation per year.

~~[45CSR13, Permit No. R13-2082 — (Condition A.5.) (GV7, GV8)]~~

4.2. — Monitoring Requirements

N/A

4.3. — Testing Requirements

N/A

4.4. — Recordkeeping Requirements

~~4.4.1. For the purpose of determining compliance with the maximum allowable sulfur limit established in Condition 4.1.2, the permittee shall require the fuel supplier to certify in writing that each shipment of diesel fuel to be combusted in the emergency generator engines contain a sulfur content of 0.5% or less. Such sulfur content certification records shall be maintained on site for a period of no less than five (5) years.~~

~~[45CSR13, Permit No. R13-2082 (Condition B.1.) (GV7, GV8)]~~

~~4.4.2. For the purpose of determining compliance with the maximum emission rate limits established in Condition 4.1.5 and the maximum fuel usage limits established for the generator engines in Condition 4.1.3, the permittee shall maintain accurate monthly records using the sample record keeping form given in ATTACHMENT 1, or its equivalent. Within fifteen (15) days after the end of the calendar month, the Production Leader or EHS Delivery Leader shall initial and date each monthly record attesting to the accuracy and completeness of the data recorded. These records shall be maintained onsite for a period of no less than five (5) years, and upon request by the Director or his or her duly authorized representative, certified copies of these records, signed by the Responsible Official, shall be provided to the Division of Air Quality (DAQ).~~

~~[45CSR13, Permit No. R13-2082 (Condition B.2.) (GV7, GV8)]~~

~~4.4.3. All power interruptions which require the utilization of either one (1) or both of the emergency electricity generators herein permitted shall be documented using the sample record keeping forms given in ATTACHMENTS 1 and 2, or their equivalent. Scheduled testing of the emergency generators shall be documented using the sample record keep forms given in ATTACHMENT 3, or its equivalent. Within fifteen (15) days after the end of the reporting period specified for each attachment, the Production Leader or EHS Delivery Leader shall initial and date the record attesting to the accuracy and completeness of the data recorded. These records shall be maintained on site for a period of no less than five (5) years, and upon request by the Director or his or her duly authorized representative, certified copies of these records, signed by the Responsible Official, shall be provided to the Division of Air Quality (DAQ). The permittee may propose to the Director a different record keeping format than described in the attachments.~~

~~[45CSR13, Permit No. R13-2082 (Condition B.3.) (GV7, GV8)]~~

4.5. Reporting Requirements

N/A

4.6. Compliance Plan

N/A

5.0 Source-Specific Requirements [Environmental Operations]

5.1. Limitations and Standards

5.1.1. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.

[45CSR§7-5.1 (Holz Impoundment)]

5.1.2. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.

[45CSR§7-5.2 (Holz Impoundment)]

5.1.3. Compliance with Condition 5.1.2 shall be demonstrated by maintaining paved or graveled roads to the impoundment area. ~~Trucks hauling bottom ash to the impoundment area shall be covered.~~

[45CSR§30-5.1.c (Holz Impoundment)]

~~5.1.4. The permittee shall submit an Initial Notification as described in 40CFR§63.6645 on or prior to February 16, 2011.~~

~~[40CFR§63.6645, 45CSR§30-5.1. (EPP)]~~

5.2. Monitoring Requirements

N/A

5.3. Testing Requirements

N/A

5.4. Recordkeeping Requirements

N/A

5.5. Reporting Requirements

N/A

5.6. Compliance Plan

N/A

ATTACHMENT 1
UNION CARBIDE CORPORATION;
R13-2082A; Plant ID No.: 0390004
MONTHLY EMERGENCY GENERATOR
NO. 2 FUEL OIL USAGE LOGSHEET ⁽¹⁾⁽²⁾⁽³⁾

Month/Year: _____ Engine No.: 1 (GV7) / 2 (GV8) (circle one)

Day	No. 2 Fuel Oil Usage			Reason Generator Was Placed Into Service
	(gal/day)	(hrs/day) Operation	(avg-gal/hr) ⁽⁴⁾	
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
Total				

- (1) _____ The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side of this form must be completed upon written request of the Director or his duly authorized representative.
- (2) _____ This record shall be maintained onsite for a period of no less than five (5) years from the last date for which data was recorded. It shall be made available, upon request, to the Director or his (her) authorized representative.
- (3) _____ The Production Leader or EHS Delivery Leader is required to initialize the reporting form within fifteen (15) days from the end of the calendar month.
- (4) _____ Calculated by dividing the gal. of No. 2 fuel oil consumed in a day (gal/day) by the number of hours per day the emergency generator engine burned No. 2 fuel oil (hrs/day). See SPECIFIC REQUIREMENT A.3. of the permit for maximum hourly consumption rate of No. 2 fuel oil.

ATTACHMENT 2

**UNION CARBIDE CORPORATION
R13-2082A; Plant ID No.: 0390004
ANNUAL EMERGENCY GENERATOR
Hours of Operation ⁽¹⁾⁽²⁾⁽³⁾**

YEAR: _____ Engine No.: 1 (GV7) / 2 (GV8) (circle one)

Month	Hours of Emergency Generator Operation		Initials ⁽³⁾
	Current Month	YTD	Current Month
January			
February			
March			
April			
May			
June			
July			
August			
September			
October			
November			
December			
Total			

⁽¹⁾ ~~The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side of this form must be completed upon written request of the Director or his duly authorized representative.~~

⁽²⁾ ~~This record shall be maintained onsite for a period of no less than five (5) years from the last date for which data was recorded. It shall be made available, upon request, to the Director or his (her) authorized representative.~~

⁽³⁾ ~~The Production Leader or EHS Delivery Leader is required to initial the reporting form within fifteen (15) days from the end of the calendar month.~~

ATTACHMENT 3

**UNION CARBIDE CORPORATION
R13-2082A; Plant ID No.: 0390004
EMERGENCY GENERATOR ENGINE
Hours of Operation For Testing Purposes⁽¹⁾⁽²⁾**

YEAR: _____ Engine No.: 1 (GV7) / 2 (GV8) (circle one)

Month	No. Operation Hours for Scheduled Testing		Initials ⁽³⁾
	Current Month	YTD	Current Month
January			
February			
March			
April			
May			
June			
July			
August			
September			
October			
November			
December			
Total			

⁽¹⁾ — The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side of this form must be completed upon written request of the Director or his duly authorized representative.

⁽²⁾ — This record shall be maintained onsite for a period of no less than five (5) years from the last date for which data was recorded. It shall be made available, upon request, to the Director or his (her) authorized representative.

⁽³⁾ — The Production Leader or EHS Delivery Leader is required to initialize the reporting form within fifteen (15) days from the end of the calendar month.

UCC Technology Park Operations
Group 2 of 3 Title V Permit Renewal Application
May 2015
Exhibit 8



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

June 11, 2012

Mr. T. J. London, WVO Responsible Care Leader
Union Carbide Corporation
P. O. Box 8361
437 MacCorkle Avenue, SW
South Charleston, WV 25303

RE: Transfer of Permit R13-2082A
Plant ID No. 039-00622
Rule 22
South Charleston, West Virginia

Dear Mr. London:

We are in receipt of your letter dated June 5, 2012, and OODA, LLC's letter of June 1, 2012, concerning the acknowledgment of transfer of Permit R13-2082A for two emergency diesel-fired electricity generators and associated diesel fuel storage located at the West Virginia Regional Technology Park, South Charleston, West Virginia.

Pursuant to Section 10.1 of 45CSR13, Permit R13-2082A is hereby transferred by default to OODA, LLC. Therefore, Permit R13-2082A and all associated information shall, henceforth, be filed under the name of OODA, LLC.

Should you have any questions concerning this matter, please feel free to contact the Permitting Section at the address and telephone number listed above.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Benedict", is written over a horizontal line.

John A. Benedict
Director

JAB/seh

c: Megan Murphy
File Room
Stephanie Hammonds

Promoting a healthy environment.