

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 February 7, 2012.

Permit Number: **R30-03900005-2012**
Application Received: **August 1, 2014**
Plant Identification Number: **03-54-03900005**
Permittee: **Union Carbide Corporation**
Facility Name: **Institute Plant**
Business Unit: **Acetone Derivatives (Group 2 of 5)**
Mailing Address: **P.O. Box 8361, South Charleston, WV 25303**

Permit Action Number: *MM01* Revised: *October 28, 2014*

Physical Location: Institute, Kanawha County, West Virginia
UTM Coordinates: 432.00 km Easting • 4,284.31 km Northing • Zone 17
Directions: From I-64, take the Institute exit, turn right onto State Route 25. Plant is
located about ½ mile west on Route 25.

Facility Description

The Acetone Derivatives Plant converts isopropanol and/or acetone to produce various ketones and alcohols that are used in a wide range of applications including hair spray, nail polish remover, lacquer thinner, sinus tablets, and coatings used in the automobile industry.

This modification is for the permanent removal of Tank 1234 and the return of Tank 1235 to service.

Emissions Summary

Since, the change in emissions due to the removal of tank T1234 will be offset by returning tank T1235 to service to store the same material previously handled by tank T1234, there are no changes in emissions associated with this modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs. Therefore, Union Carbide Corporation 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:	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Pollutants
	40 C.F.R. 63, Subpart G	National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater

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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
CO-R21-97-41	October 20, 1997	June 14, 2006 letter from J.L. Blatt October 7, 2011 letter from T.J. London

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

The changes made to this Title V Permit as a result of the Modification are:

- Removed T1234 from the Emissions Unit Table in Section 1.0.
- Added “(Planned for Decommissioning in 2014)” to T1236 description in the Emissions Unit Table Section 1.0 to show that tank T1236 will be taken out of service by the end of 2014 and should be removed from the permit during the next modification or renewal.
- Removed T1234 from conditions 4.1.2 and 4.4.3 and added T1235. T1235 was previously an “idle” tank that was not used to store any materials. Upon being returned to service, it will store the same material that was being stored in tank T1234, thus making it a Group 2 Storage Vessel under 40 C.F.R. 63 Subpart G.

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: NA
Ending Date: NA

Point of Contact

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478
Robert.A.Mullins@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.