

Fact Sheet



*For Final Renewal Permitting Action Under 45CSR30 and
Title V of the Clean Air Act*

Permit Number: **R30-03900007-2010 (3 of 8) (Carbofuran/Carbosulfan)**

Application Received: **May 21, 2009**

Plant Identification Number: **03900007**

Permittee: **Bayer CropScience, LP**

Facility Name: **Institute Site**

Mailing Address: **P.O. Box 1005**

Institute, WV 25112

Physical Location: Institute, Kanawha County, West Virginia
UTM Coordinates: 432.0 km Easting • 4,248.3 km Northing • Zone 17
Directions: The facility is located west of Institute, WV, adjacent to State Route 25 and West Virginia State College.

Facility Description

Bayer CropScience, an agricultural chemical based company, operates a multi-product, multi-process chemical plant. The Plant has five basic manufacturing units along with several other production facilities primarily responsible for producing raw materials used in the manufacture of agricultural chemicals. The principal products produced at the Institute site are SEVIN brand carbaryl, TEMIK brand aldicarb, LARVIN brand thiodicarb, methomyl, RHODIMET AT-88, oxamyl, BPMC, Carbofuran, and Carbosulfan. SIC Codes: 2879; 2869

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions (Group 3)	2008 Actual Emissions (Facility Wide)
Carbon Monoxide (CO)	0	70

Nitrogen Oxides (NO _x)	0	2,526
Particulate Matter (PM ₁₀)	< 0.01	33.7
Total Particulate Matter (TSP)	< 0.01	67.3
Sulfur Dioxide (SO ₂)	1.18	3,371
Volatile Organic Compounds (VOC)	37.3	117
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions (Group 3)	2008 Actual Emissions (Facility Wide)
n-Hexane	17.61	8.06
Methyl Isocyanate	0.08	0.19
Total HAP's	20.80	181

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 459 TPY of CO, 6,951 TPY of NO_x, 7,928 TPY of SO₂, 620 TPY of VOC's, and 920 TPY of Total HAP's. Due to this facility's potential to emit over 100 tons per year of CO, NO_x, SO₂, VOC's, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Bayer CropScience 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR1	NO _x budget trading program.
	45CSR6	Open burning prohibited.
	45CSR7	Particulate Matter emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
45CSR30	40 C.F.R. Part 61	Operating permit requirement.
	40 C.F.R. Part 82, Subpart F	Asbestos inspection and removal
	40 C.F.R. Part 63 MMM	Ozone depleting substances
		Pesticide Active Ingredient MACT
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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>)
R13-0798*	6/7/85	
R13-2413B	7/10/06	

* - This permit was originally incorrectly labeled as R13-0793

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 B," which may be downloaded from DAQ's website.

Determinations and Justifications

There have been no revisions since the most recent version of this Permit.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

1. 40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM)

Group 3 (Carbofuran/Carbosulfan) does not have a pollutant specific emissions unit (PSEU) for any pollutant meeting the applicability requirements of 40 C.F.R. §64.2 and therefore does not need to have submitted a CAM plan in accordance with the CAM rule.

Group 3 (Carbofuran/Carbosulfan) is not subject for the following reasons:

40CFR§64.2(a)(3) – Group 3 (Carbofuran/Carbosulfan) does not have a potential pre-control device equal to or greater than 100 percent of the amount, in tons per year, of any pollutant that would require the facility to be classified as a major source.

2. 40 C.F.R. Part 63, Subpart FFFF (MON MACT)

The equipment in Group 3 (Carbofuran/Carbosulfan) is subject to 40CFR63, Subpart MMM (PAI MACT). Since they are already subject to Subpart MMM, they are not subject to the requirements for 40CFR63, Subpart FFFF (MON MACT) because of the following:

40CFR§63.2535(d) – Compliance with MMM of this part 63. After the compliance dates specified in 40CFR§63.2445, if you have an affected source with equipment subject to subpart MMM of this part

63, you may elect to comply with the provisions of subpart MMM of this part 63, respectively, for all such equipment.

40CFR§63.2535(1)(3)(ii)(B) – If the primary product is subject to Subpart MMM of this part 63, then comply with the requirements of subpart MMM for each MCPU in the PUG.

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: December 15, 2009

Ending Date: January 14, 2010

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

Mike Egnor
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

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.

Point of Contact

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Condition 4.2.1 was slightly reworded to make the intent of the requirement more clear. That samples will be taken every 15 minutes will show that the facility is showing continuous monitoring of DCM and MIC. Language was added to Condition 4.1.3 and 5.1.3 to make the permit more practicably enforceable. The citation is “* - The facility shall not exceed the annual emissions listed in Table A.3. during any consecutive 12 month period.”

Condition 4.2.9 had language added to clarify what normal facility operation was. The added citation is “(i.e. excluding startup/shutdown/malfunction events or when the emission point process is not operating unless the emission point process has not operated for the entire month)”

Condition 4.4.1 and 5.4.1 have been changed from annually calculating actual emissions to monthly calculating actual emissions. This is to ensure continual compliance of the Permit.