

Fact Sheet

For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03900004-2015 (2 of 2)**
Application Received: **May 15, 2015**
Plant Identification Number: **039-00004**
Permittee: **Union Carbide Corporation**
Facility Name: **Technology Park Operations**
Mailing Address: **P.O. Box 8361**
South Charleston, WV 25303

Revised: N/A

Physical Location: South Charleston, Kanawha County, West Virginia
UTM Coordinates: 438.7 km Easting • 4,245.5 km Northing • Zone 17
Directions: From Charleston take Kanawha Turnpike exit. Travel west on Kanawha Turnpike approximately 0.5 miles.

Facility Description

This Permit (Group 2 of 2) will cover Facility support activities and infrastructure operations. The research and development groups (Group 1 of 2) provide experimental, analytical, and engineering support for the development of new products, process technology for manufacturing, and support for existing products and processes. Previously, the permittee also had a Group 3 of 3 permit, however this permit became inactive on November 16, 2012 because the unit was sold to Univation Technologies, LLC, which is not a major source. Primary SIC Code for this Facility: 2869

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2013 Actual Emissions
Carbon Monoxide (CO)	38	8.10
Nitrogen Oxides (NO _x)	11	1.49
Particulate Matter (PM _{2.5})	1	<0.01
Particulate Matter (PM ₁₀)	1	<0.01
Total Particulate Matter (TSP)	1	0.01
Sulfur Dioxide (SO ₂)	0.1	<0.01
Volatile Organic Compounds (VOC)	128	65.55

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2013 Actual Emissions
Total HAPs	7.2	2.53

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

Title V Program Applicability Basis

This facility has the potential to emit 128 TPY of VOCs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, 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.

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

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

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>)
None	N/A	

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

New Tank

A new 10,150 gallon storage tank (HZ3) was installed in 2014. This tank contains a lime solution received in tank trucks. The material stored in this tank is not a VOC or hazardous air pollutant and is not subject to any state or federal regulations. No additional requirements were added to this permit due to this equipment addition.

Other Equipment Changes

The emission units previously listed in the Shared Services/Energy Systems section of the emission units table are no longer under the ownership or operational control of Union Carbide Corporation.

The following units, which had no applicable requirements, were transferred to the West Virginia Regional Technology Park:

- 704 Additive Storage Tank #1 (Emission Unit: ST2)
- 704 Additive Storage Tank #2 (Emission Unit: ST7)
- 742 Additive Storage Tank (Emission Unit: STC)
- 770 Additive Storage Tank (Emission Unit: STD)
- 2000 Additive Storage Tank (Emission Unit: STG)
- 6000 Additive Storage Tank (Emission Unit: STH)
- B2000 Propane Powered Emergency Electrical Generator (Emission Unit: EG1)
- B740 Propane Powered Emergency Electrical Generator (Emission Unit: EG4)

Additionally, two Building 6000 Diesel Fueled Emergency Electric Generators (Emission Points: GV7 and GV8) and support equipment (Emission Units: STI, STJ, and STL), which were also previously listed in the Shared Services/Energy Systems section of the emission units table, were transferred to OODA, LLC (039-00622). These generators and support equipment were permitted under R13-2082A and Section 4.0 of the previous Title V permit. R13-2082A has been transferred to OODA, LLC, and the previous Title V permit's Section 4.0 requirements were removed.

Additional Permit Changes

Section 5.0 of the previous Title V permit addressed Environmental Operations. With the removal of Section 4.0 from the previous Title V permit, as discussed previously, this permit section was renumbered as Section 4.0. Additionally the following changes were also made:

- Condition 5.1.3 of the previous Title V permit (Condition 4.1.3 of the renewal) was revised to eliminate the requirement for trucks hauling bottom ash to be covered. The coal fired boiler at this facility was permanently shut down in 2012, and bottom ash is no longer trucked to the Holz Impoundment.
- Condition 5.1.4 of the previous Title V permit contained notification requirements for the gasoline fueled pump (EPP). The pump was removed in 2010, therefore this condition was removed from the renewal.

Non-Applicability Determinations

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

45CSR27 – To Prevent and Control the Emissions of Toxic Air Pollutants: The emissions of toxic air pollutants at the facility does not exceed the threshold values in 45CSR27 Table A, so the facility is not subject to Best Available Technology requirements.

40 C.F.R. Part 64—Compliance Assurance Monitoring: The Union Carbide Corporation’s Technology Park’s Environmental Operations are not subject to the Compliance Assurance Monitoring (CAM) rule because the Group 2 of 2 Permit has no emission sources with control devices.

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: Monday, June 22, 2015

Ending Date: Monday, July 22, 2015

Point of Contact

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

Rex Compston, P.E.

West Virginia Department of Environmental Protection

Division of Air Quality

601 57th Street SE

Charleston, WV 25304

Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

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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.