

Fact Sheet



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

Permit Number: **R30-03900007-2011**
Application Received: **June 14, 2010**
Plant Identification Number: **03900007**
Permittee: **Bayer CropScience, LP**
(Rhodimet)
(Group 2 of 8)
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 • 4,248.310 km Northing • Zone 17
Directions: The facility is located west of Institute, WV, adjacent to State Route 25 and West Virginia State University

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

Group Description

The facility was divided into 8 Title V Permits. They were broken down as follows:
Group 1 – Powerhouses, Maintenance, Wastewater Treatment Unit, Laboratories
Group 2 – Rhodimet
Group 3 – Carbofuran Unit, Carbosulfan Unit
Group 4 – Aldicarb, BPMC, Oxamyl
Group 5 – Polymers (Note this process was closed in 2004 and no Title V Group 5 Permit was issued)

Group 6 – Larvin Unit
 Group 7 – Naphthol Unit, PANA, Jet
 Group 8 – Phosgene, MIC, SEVIN

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions (Group 2)	2009 Actual Emissions (Facility Wide)
Carbon Monoxide (CO)	7.5	85
Nitrogen Oxides (NO _x)	38.8	2,436
Particulate Matter (PM ₁₀)	12.0	33.7
Total Particulate Matter (TSP)	12.0	64.4
Sulfur Dioxide (SO ₂)	24.5	3,057
Volatile Organic Compounds (VOC)	5.5	97.8
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions (Group 2)	2009 Actual Emissions (Facility Wide)
Total HAPs	<0.1	153.25

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, 185 TPY of PM₁₀, 11,143 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, PM₁₀, 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.

Group 1 at this facility* has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Particulate Matter emissions
	45CSR6	Open burning prohibited.
	45CSR7	Particulate Matter emissions
	45CSR10	SO ₂ Air 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.
	45CSR21	Volatile Organic Compounds
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 60 Kb	Tanks
	40 C.F.R. Part 60 VV	Equipment Leaks
	40 C.F.R. Part 60 III	Air Oxidation Unit Processes
	40 C.F.R. Part 60 NNN	VOC's
	45CSR40	Control of Ozone Season NOx
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 UU	National Equipment Standards for Equipment Leaks
	40 C.F.R. Part 63 YY	Generic MACT (Hydrogen Cyanide)
	40 C.F.R. Part 63 EEE	Hazardous Waste Combustor MACT
	40 C.F.R. Part 63 FFFF	Miscellaneous Organic NESHAP
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 75 Subpart H	NOx Mass Emissions Provisions
State Only:	45CSR4	No objectionable odors.
	45CSR42	Greenhouse Gas Emissions Inventory Program

*Other groups at this facility may be subject to additional applicable state and federal rules.

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 (if any)
R13-1448B	7/30/2007	
CO-R21-97-4	2/19/1997	

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

Changes made to the Title V Permit since the last revision is summarized below:

1. 45CSR40 – CAIR NO_x Season Trading Program
Previous Condition 3.1.9 addressed the NO_x Budget Trading Program from 45CSR1. The trading program has since been replaced with the CAIR NO_x Ozone Trading Program from 45CSR40. However, the emissions sources that fall under 45CSR40 for this facility are three boilers, which are regulated under the Group 1 Permit. Therefore, this requirement has been removed from this Group 2 Permit.
2. Greenhouse Gas Tailoring Rule
Condition 3.1.9 has been added to the Permit to address greenhouse gas reporting per 45CSR42. All greenhouse gases emitted above the de minimis amounts must be reported.

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 2 is not subject for the following reasons:

40CFR§64.2(a)(2) – The only units theoretically capable of having potential pre-control device of 100 percent of the amount of tons per year of a pollutant with an emission limit is the flare and thermal oxidizer. However, these are both used in emergency situations. Regardless, neither unit uses a control device to meet this limit, so CAM does not apply to Group 2.

2. *Greenhouse Gas Tailoring Rule*

This is a renewal Title V Permit and there have been no modifications that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

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: March 9, 2011
Ending Date: April 8, 2011

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)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.