

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 April 23, 2013.

Permit Number: **R30-05100002-2013**
Application Received: **July 8, 2013**
Plant Identification Number: **03-54-051-00002**
Permittee: **Eagle Natrium LLC**
Facility Name: **Natrium Plant**
Mailing Address: **P.O. Box 191, New Martinsville, WV 26155**

Permit Action Number: *MM01* Revised: *September 24, 2013*

Physical Location: New Martinsville, Marshall County, West Virginia
UTM Coordinates: 512.70 km Easting • 4399.60 km Northing • Zone 17
Directions: WV State Route 2, 5 miles north of New Martinsville, WV.

Facility Description

Eagle Natrium LLC owns and operates a Chlor-Alkali and Derivatives Plant in Marshall County, West Virginia commonly known as the Natrium Plant. The plant operates 24 hours a day, 7 days a week. The facility is located 6,850 feet above salt deposits. In 1941 the U.S. Government purchased the current plant site and began to drill the salt bed to produce the brine needed to produce chlorine (Cl₂) and caustic soda (NaOH). In addition to producing Cl₂ and NaOH, the facility produces hydrogen gas (H₂), hydrochloric acid (HCl), and calcium hypochlorite [Ca(OCl)₂]. The facility is a Chemicals and Allied Products facility and operates under SIC codes 2812 (Alkalies and Chlorine) and 2819 (Industrial Inorganic Chemicals, Not Elsewhere Classified).

The scope of this minor modification is to incorporate the alternative HCl monitoring requirements approved in NSR permit R13-2046G.

Emissions Summary

There are no changes in potential or actual emissions for this permitting action.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 661 tpy of CO; 3,680 tpy of NO_x; 960 tpy of PM₁₀; 15,000 tpy of SO₂; 100 tpy of VOC; 661 tpy of hydrochloric acid; and 38 tpy of hydrofluoric acid. Due to this facility's 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, Eagle Natrium LLC – Natrium Plant 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:	45CSR13	Construction/modification permits
	45CSR30	Operating permit requirement.
State Only:	None	

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>)
R13-2046G	8/1/2013	

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

- I. **45CSR13, Permit No. R13-2046G.** Changes to the NSR permit are limited to converting condition 4.2.1. to 4.2.2., which results in the rest of the conditions in Section 4.2. being renumbered. Also, alternative reference language is added to the beginning of new condition 4.2.2. Second, the updated permit created a new condition 4.2.1. Based upon these changes, the following revisions are made in the Title V permit conditions:
- a. Current Conditions 7.2.1. and 7.2.2. – Citations of authority are revised to account for renumbered underlying requirements.
 - b. Current Condition 7.2.5. – Existing language is deleted, and replaced with new requirements in 4.2.1. of the revised NSR permit.
 - c. New Condition 7.2.6. – This new condition sets forth the requirements of NSR permit condition 4.2.2., which had its first sentence modified to account for the requirement being an alternative monitoring method, and the NSR condition number was renumbered from 4.2.1. to 4.2.2.

Section 1.2. of the operating permit is revised to indicate the current revision of the NSR permit.

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: Not Applicable for minor modifications.
Ending Date: N/A

Point of Contact

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

Denton B. McDerment, PE
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478
denton.b.mcderment@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)

No comments were received from U.S. EPA.