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**west virginia department of environmental protection**

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Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone: 304/926-0475 • Fax: 304/926-0479

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

## **Evaluation Memo**

**Application Number:** R13-2443D

**Facility ID Number:** 051-00009

**Name of Applicant:** Covestro LLC

**Name of Facility:** Covestro New Martinsville

**Application Type:** Class I Administrative Update

**Received Date:** June 3, 2016

**Complete Date:** June 8, 2016

**Due Date:** August 7, 2016

**Permit Writer:** Mike Egnor

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### **Overview:**

This Class I Administrative update application is the result of replacing existing a 7,000 gallon RM Tank STV43 (EP9) with a 16,000 gallon RM Tank STV43a (EP9a). Ortho-Toluene Diamine (o-TDA), which was stored in RM Tank STV38 (EP8) will now be stored in the new RM Tank STV43a (EP9a). Meta-Toluene Diamine (m-TDA), which was stored in RM Tank STV43 (EP9) will now be stored in RM Tank STV38 (EP8). The new RM Tank STV43a (EP9a) has vapor recovery, which will result in the reduction of working losses of o-TDA by less than 0.01 lbs/yr.

### Process Description and Proposed Changes:

Currently the Polyol Unit, which is permitted under R13-2443C and Section 7 of R30-05100009-2013, utilizes two different isomers of Toluene Diamine - ortho and meta as raw materials. The differences in the isomer ratios are shown in the table below, but the physical properties of the two materials are very similar.

Component	CAS no.	Weight % in o-TDA	Weight % in m-TDA
3,4-Toluene Diamine	496-72-0	50-70	-
2,3-Toluene Diamine	2687-25-4	30-50	-
2,4-Toluene Diamine	95-80-7	<1	60-100
2,6-Toluene Diamine	823-40-5	-	10-30

There are no planned changes in the reaction or in the raw materials, this permit determination only concerns the storage of these raw materials. Hence a process diagram was not deemed to be necessary.

Covestro is planning to convert the existing o-TDA storage tank (EP8) to m-TDA storage. The existing m-TDA tank (EP-9) will be demolished and a new, larger o-TDA tank will be installed at the same location (EP-9a). (Please note that the "a" in the nomenclature represents a new tank, while the functional location remains the same)

#### Current Storage Arrangement

Emission Unit Description	Emission Unit ID	Emission Point ID	Volume (gal)	Material	Annual Throughput Limit Permitted (gal)
RM Tank (STV38)	011-735	EP8	12,800	o-TDA	5,736,698
RM Tank (STV43)	011-137	EP9	7,000	m-TDA	-

#### New Storage Arrangement

Emission Unit Description	Emission Unit ID	Emission Point ID	Volume (gal)	Material	Annual Throughput Limit Permitted (gal)
RM Tank (STV38)	011-735	EP8	12,800	m-TDA	-
RM Tank (STV43a)	011-137a	EP9a	16,000	o-TDA	5,736,698

**The changes submitted in this Class I Administrative update R13-2365I include:**

1. Changed the emission point id for o-TDA from EP8 to EP9a, emission unit id from 011-137 to 011-137a, and emission point id for m-TDA from EP9 to EP8 in Condition A.2.
2. Changed the emission point id for o-TDA from EP8 to EP9a in Condition A.4.
3. Corrected storage tank for emission point EP9a from "011-7350" to "011-735".
4. Miscellaneous changes to update the Permit to R13-2443D, including changing the name of the facility from "Bayer MaterialScience LLC" to "Covestro LLC", the revision of Condition C.3, and the mailing address.

**Nonapplicability:**

40CFR60, Subpart Kb

The new tank STV43A is less than 75 cubic meters (60.6). Therefore this NSPS is not applicable.

**Emissions:**

By upgrading the RM Tank STV43 to RM Tank STV43A with vapor recovery there will be a reduction of less than 0.01 lbs/yr of Toluenediamine.

**Recommendation:**

The writer recommends that the Class I Administrative Update Permit R13-2443D be granted to Covestro LLC, New Martinsville facility located in Marshall County, WV. Based on the information provided in the permit application, the applicant meets all applicable federal and state air regulations pertaining to the requested change.



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June 16, 2016

CERTIFIED MAIL  
91 7199 9991 7032 6242 2633

Jeffrey S. Bolton  
Covestro LLC  
17595 Energy Road  
Proctor, WV 26055

Re: Covestro LLC  
New Martinsville  
Permit No. R13-2443D  
Plant ID No. 051-00009

Dear Mr. Bolton:

Your application for a permit as required by Section 5 of 45CSR13 - "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permit, General Permit, and Procedures for Evaluation" has been approved. The enclosed permit R13-0882I is hereby issued pursuant to Subsection 5.7 of 45CSR13. Please be aware of the notification requirements in the permit which pertain to commencement of construction, modification, or relocation activities; startup of operations; and suspension of operations.

The source is subject to 45CSR30. The permittee has the duty to update the facility's Title V (45CSR30) permit application to reflect the changes permitted herein.

In accordance with 45CSR30- Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [ §§22B-1-1 et seq. ], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

Should you have any questions or comments, please contact me at (304) 926-0499, extension 1208 or [michael.egnor@wv.gov](mailto:michael.egnor@wv.gov).

Sincerely,



Mike Egnor  
Engineer

Enclosures