

# Fact Sheet



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

Permit Number: **R30-07300003-2009**

Application Received: **May 19, 2009**

Plant Identification Number: **07300003**

Permittee: **CYTEC Industries Inc.**

Facility Name: **Willow Island Plant**

Manufacturing Unit: **Site Services (Part 3 of 4)**

Mailing Address: **#1 Heilman Avenue, Willow Island, WV 26134-9801**

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Physical Location: Willow Island, Pleasants County, West Virginia  
UTM Coordinates: 474.00 km Easting • 4,356.00 km Northing • Zone 17  
Directions: From Interstate 77, Exit 179, take State Route 2 north for approximately 10 miles. Plant site is on the left (river side) of State Route 2, two miles south of Belmont, WV.

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### **Facility Description**

CYTEC Industries is a global, research-based specialty chemical company. The company operates a multi-product, multi-process chemical plant at Willow Island, WV. Plant operations are divided into the following three manufacturing units and one support services unit: Urethane Chemicals (Part 1 of 4), Surfactants (Part 2 of 4), Site Services (Part 3 of 4), and Polymer Additives (Part 4 of 4).

The Site Services Area (Part 3 of 4) supports the manufacturing processes at the CYTEC facility. Site Services is comprised of the Powerhouse (including two natural gas/distillate oil fired boilers), the on-site biological wastewater treatment system, the Equalization/Neutralization (E/N) wastewater unit operation, a distillate fuel oil storage tank, a diesel engine, and emergency diesel engines.

The initial Title V Permit was divided into the following four manufacturing units and one support services unit: Urethane Chemicals (Part 1 of 5), Surfactants (Part 2 of 5), Site Services (Part 3 of 5), Polymer Additives (Part 4 of 5), and Criterion Catalyst (Part 5 of 5). The Criterion Catalyst Manufacturing Unit (Part 5 of 5) was sold on September 1, 2003 and is no longer owned or controlled by CYTEC Industries Inc.

Because Urethane Chemicals (Part 1 of 5) and Surfactants (Part 2 of 5) were issued on February 5, 2003 and September 24, 2002, before the Criterion Catalyst Manufacturing Unit was sold, the naming system proposed for the initial Title V permits was continued for Site Services (Part 3 of 5) and Polymer Additives (Part 4 of 5). The naming system for the renewal permits will be changed to reflect the sell of the Criterion Catalyst Manufacturing Unit and there will only be four parts to the Title V renewal permits.

### Emissions Summary

<b>Site Services (Part 3 of 4) Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2008 Actual Emissions</b>
Carbon Monoxide (CO)	72.83	32.73
Nitrogen Oxides (NO <sub>x</sub> )	81.97	19.21
Particulate Matter (PM <sub>10</sub> )	14.04	3.69
Total Particulate Matter (TSP)	14.04	3.69
Sulfur Dioxide (SO <sub>2</sub> )	41.80	0.26
Volatile Organic Compounds (VOC)	114.06	45.52

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2008 Actual Emissions</b>
Acetonitrile	0.25	0.04
Acrylic Acid	1.44	0.02
Acrylonitrile	0.41	0.09
Benzene	0.37	0.01
Chloroform	0.47	0.01
Dimethyl Formamide	0.08	0.06
Ethylbenzene	0.18	0.02
Formaldehyde	0.25	0.05
Hexane	1.98	0.41
Methanol	3.35	1.18
Methyl Isobutyl Ketone	47.94	25.50
Methylene Chloride	2.00	0.05
Toluene	26.58	6.03
Triethylamine	7.69	4.59
Xylenes (isomer and mixtures)	0.27	0.01
Total HAPs	93.25	38.07

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

### **Title V Program Applicability Basis**

Due to the facility-wide potential to emit over 100 tons per year of a criteria pollutant (VOCs), over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs), CYTEC Industries Inc. 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:	45CSR2	Particulate matter and opacity limits for indirect heat exchangers.
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur dioxide limits.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor sources.
	45CSR16	Emission Standards for New Stationary Sources Pursuant to 40 C.F.R. Part 60.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants.
	40 C.F.R. 60, Subpart Dc	Standards of Performance For Small Industrial-Commercial-Institutional Steam Generating Units.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63, Subpart GGGGG	National Emission Standards For Hazardous Air Pollutants: Site Remediation.
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR27	Best Available Technology (BAT) for Toxic Air Pollutants (TAPs)

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)
R13-0936B	June 11, 2009	None
R13-2560E	September 18, 2006	None

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**

**Title V Administrative Amendments/Minor Modifications/R13 Changes**

The initial Title V Permit for R30-07300003-2002 (Part 3 of 5) was issued on December 14, 2004. Since then, the Title V permit has been modified as follows:

- 1) **R30-07300003-2002 (Part 3 of 5) – MM01 issued on November 2, 2005.** This minor modification addressed changes resulting from permitting actions R13-2560B, R13-2560C, and R13-2156A. R13-2560B was issued on July 11, 2005 and resulted in the reduction of emission limits for nitrogen oxides (NO<sub>x</sub>) and sulfur dioxides (SO<sub>2</sub>) by utilizing the manufacturer's guaranteed emission factors and low-sulfur distillate oil. R13-2560C was issued on September 20, 2005 and was requested to make various deletions and corrections to R13-2560B. R13-2156A was issued on April 7, 2005 and replaced the Consent Order CO-R27-C-2000-27 requirements specified in 4.1.1 and 4.1.2 for acrylonitrile and formaldehyde discharges and emissions and also replaced the 4.3.1 acrylonitrile and formaldehyde recordkeeping requirements.

CYTEC also requested the removal of the requirements in the 1.0 Emission Units Table, Sections 7.0 and 8.0, and Appendix A for Boilers 976X and 977X (and associated equipment) and Boiler 978X since these boilers were removed from service. Boilers 976X and 977X were removed from service effective September 1, 2005 and Boiler 978X was removed from service effective November 1, 2005.

- 2) **R30-07300003-2002 (Part 3 of 5) – MM02 issued on May 4, 2006.** This minor modification incorporated changes from R13-2560D, issued on December 15, 2005. The changes included minor deletions of some equipment items; a change in the frequency of visible emission observations from monthly to quarterly for emission point 226E; a change in the fuel for Boilers 830X and 831X from No. 2 Fuel Oil to Distillate Oil; modification to the annual emission limits for Boilers 830X and 831X when fired by oil; and a decrease in the allowable quantity of Distillate Oil combusted and stored.
- 3) **R30-07300003-2002 (Part 3 of 5) – MM03 issued on March 12, 2007.** This minor modification included the following requested changes: 1) Removal of the reference to Boiler 978X in 3.7.2 because the boiler was permanently removed from service; 2) Correction of Condition 5.1.2 to properly incorporate requirement 4.1.2; 3) Removal of the daily hours of operation and daily fuel usage recordkeeping requirements from 6.4.1 for Boilers 830X and 831X; and 4) Replacement of the 40 C.F.R. 63, Subpart GGGGG placeholder language with the applicable recordkeeping requirements for the benzene groundwater pumping activity.

Condition 5.1.2 was modified to correctly incorporate requirement 4.1.2 of R13-0936A. Condition 4.1.2 of R13-0936A states that “If the permittee emits any HAP other than those listed in Table 4.1.3. from any source listed in section 1.0, the permittee shall provide written notification to the Director within thirty (30) days after beginning or discovering such emissions.” After reviewing the Emission Units table in section 1.0, it was determined that the only emission sources listed in the table were the E/N Tank C (226X) and E/N Tank B (226Y) venting through emission point 226E, so Condition 5.1.2 was corrected to state that “If the permittee emits any HAP other than those listed in Table 5.1.2 from the E/N Tank C (226X) and E/N Tank B (226Y) venting through emission point 226E...” instead of “If the permittee emits any HAP other than those listed in Table 5.1.2 from any source other than the E/N Tank C (226X) and E/N Tank B (226Y) venting through emission point 226E...”.

The daily hours of operation and daily fuel usage recordkeeping requirements of 6.4.1 for Boilers 830X and 831X were removed in accordance with the Class I administrative update R13-2560E, issued on September 18, 2006. The 40 C.F.R. §60.48c(g) requirement to maintain daily fuel usage records was modified on February 27, 2006 to allow the owner or operator of an affected facility that burns only very low sulfur oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/mmBTU) heat input or less to maintain records of the fuels combusted on a monthly basis instead of daily. Since the permittee is also required under 45CSR§§2-8.3.c and 8.3.d and 45CSR§§2A-7.1.a.1 and 7.1.a.2 to maintain fuel usage records on a monthly basis, removing the daily recordkeeping requirements did not conflict with the requirements of 45CSR2 and 45CSR2A.

The 40 C.F.R. 63, Subpart GGGGG Site Remediation MACT placeholder language was replaced with the applicable recordkeeping requirements for the benzene groundwater pumping activity. Since the total quantity of the HAP listed in Table 1 of 40 C.F.R. 63, Subpart GGGGG that is contained in the remediation material removed during the site remediations conducted at the facility is less than 1 megagram (Mg) annually, 40 C.F.R. §§63.7881(c) exempts the permittee from the requirements of 40 C.F.R. 63, Subpart GGGGG except for the recordkeeping requirements of 40 C.F.R. §63.7881(c)(2).

- 4) **R13-0936B issued on June 11, 2009.** R13-0936B is a Class II administrative update for the operation of the Equalization/Neutralization (E/N) Unit. This update incorporated minor regulatory revisions and monitoring requirements for the scrubber operation and was submitted in preparation of the Title V renewal permit application for Site Services. The changes approved under R13-0936B were incorporated as follows: 1) Deleted acrylonitrile as an individual pollutant from Condition 5.1.1 and from Table 5.1.2 since it is no longer used at the plant; 2) Deleted the references to 45CSR27 in Condition 5.1.1 since there are no longer acrylonitrile emissions subject to the BAT requirements of 45CSR27; 3) Added a phrase to Condition 5.1.2 to limit the requirement to submit written notifications of new HAPs to only those with at least 50 lb/year of emissions; 4) Added a footnote to Table 5.1.2 to indicate that formaldehyde emissions are below the thresholds of 45CSR13, Table 45-13A and 45CSR27; 5) Removed the 45CSR7 mineral acid requirements (Condition 5.1.4 in the initial Title V permit) at the Equalization/Neutralization Unit since this unit does not meet the definition of a manufacturing process; 6) Added minor clarifying language and flexibility to use electronic data logging in Conditions 5.2.1 and 5.2.2; 7) Deleted testing requirements (Condition 5.3.1 in the initial Title V permit) which were associated with deleted Condition 5.1.4; and 8) Changed the language in Condition 5.4.1 to reference “recordkeeping” instead of “log sheet.” The changes approved under R13-0936B were included in this Title V renewal permit and a separate Title V application for a permit modification was not required.

#### **Other Changes to the Title V Permit**

- 1) **Removed Conditions from Consent Order CO-R27-C-2000-27 (4.1.3, 4.2.1, 4.3.1, and 4.4.1 in the initial Title V Permit).** 45CSR§27-3.1 states that any source or equipment specifically subject to a federal regulation or standard shall not be required to comply with provisions more stringent than such regulation or standard. Since CYTEC’s benzene emissions are primarily the result of groundwater remediation (with a minute amount from the combustion process in Boilers 830X and 831X), and the groundwater remediation activities are regulated under 40 C.F.R. 63, Subpart GGGGG – “National Emission Standards for Hazardous Air Pollutants: Site Remediation,” the groundwater remediation activities are no longer

subject to the requirements under 45CSR§27-3.1. Also, it should be noted that CYTEC is subject to only the recordkeeping requirements of 40 C.F.R. 63, Subpart GGGGG, and that in order for CYTEC to be subject to only the recordkeeping under 40 C.F.R. 63, Subpart GGGGG, they are required to maintain written documentation to support the facility's determination that the total quantity of benzene removed during all site remediation activities conducted at the facility is less than 1 megagram (Mg) annually. This 1 Mg limit is more stringent than the 10 Mg limit for benzene from Consent Order CO-R27-C-2000-27. In addition, the potential annual facility-wide emissions of benzene are now less than the 45CSR27 applicability threshold of 1,000 lb/year. For all of these reasons, a determination was made not to include conditions 4.1.3, 4.2.1, 4.3.1, and 4.4.1 from the initial Title V permit in this Title V permit renewal.

In a letter dated May 13, 2009 to the Director of Air Quality, CYTEC requested the termination of Consent Order CO-R27-2000-27 since the three toxic air pollutants (acrylonitrile, formaldehyde, and benzene) that once exceeded the 45CSR27 applicability thresholds are either no longer used at the site (as in the case of acrylonitrile) or have potential annual emissions which are now less than the 45CSR27 applicability thresholds (formaldehyde and benzene). This request was incorporated via Condition 3.7.2.q of R30-07300003-2009 (Part 3 of 4).

- 2) **Removed all 45CSR7 Requirements.** A determination was made in R13-0936B that mineral acid emissions from the Equalization/Neutralization Unit are not subject to 45CSR7. Since these emissions are not subject to 45CSR7 and there are no other particulate matter emission sources in Site Services which are subject to 45CSR7, Conditions 3.1.10, 3.1.11, 3.1.12, 3.3.2, 3.4.4, 3.4.5, 5.1.4, 5.1.5, 5.2.3, 5.3.1, and 5.4.3 from the initial Title V permit were not included in this Title V permit renewal.
- 3) **Removed Conditions 6.3.1 and 6.3.2 which required the permittee to conduct initial performance testing in accordance with 40 C.F.R. 60, Subpart Dc for Boilers 830X and 831X.** Initial compliance testing for Boilers 830X and 831X to demonstrate compliance with the 20 percent opacity performance standard per 40 C.F.R. §§63.45c(a) and 60.8 while combusting distillate fuel oil was conducted on September 27 and 28, 2005. The initial fuel supplier certification to demonstrate compliance with the SO<sub>2</sub> standards for distillate oil was submitted along with the performance test results for the opacity testing.
- 4) **Removed the initial notification requirements of 40 C.F.R. 60, Subpart Dc in Condition 6.5.1 of the initial Title V Permit.** Since the initial notification has been submitted, this condition was removed.
- 5) **Removal of the 40 C.F.R. 63, Subpart DDDDD requirements for Boilers 830X and 831X (Conditions 6.1.8, 6.3.3, 6.3.4, 6.4.4., 6.5.2, 6.5.4, and 6.5.5 in the initial Title V Permit) and replacement with placeholder language in Condition 6.1.8 of the Title V renewal permit.** On July 30, 2007, the United States Court of Appeals for the District of Columbia Circuit vacated and remanded the Boiler MACT. As a result of the court's decision, a MACT for this source category will have to be implemented via a 112(j) case-by-case MACT determination or a subsequent 40 C.F.R. 63 proposal. After consultation with US EPA Region III in which DAQ was informed that 112(j) applied to the vacated standard 40 C.F.R. 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters", but that no date of becoming subject was known, the agency determined that inserting a permit condition to address this situation to allow for a permit application shield while US EPA was in the process of re-proposing and re-promulgating a MACT standard was a reasonable course of action and use of limited resources. The agency's current position to delay the 112(j) reviews is based on the September 10, 2009 order filed by the United States District Court for the District of Columbia for US EPA to issue a new Boiler and Process Heater MACT to be proposed by April 15, 2010 and promulgated by December 16, 2010; to maintain national consistency; and to most effectively use agency resources. Due to these facts, the 40 C.F.R. 63, Subpart DDDDD requirements were removed for existing Boilers 830X and 831X and placeholder language was included as Condition 6.1.8.

- 6) **Revisions to the Section 1.1 Emission Units Table.** The Emission Units Table in the initial Title V Permit included a section headed “*The following equipment has no applicable federal or state air regulatory requirements. This listing is for informational purposes.*” The equipment listed in this section was not included in the Title V renewal permit since it has no applicable requirements. Also, the wastewater treatment plant equipment which was listed individually in the initial Title V permit was combined into a single entry entitled “On-Site Biological Wastewater Treatment System” in the Title V renewal permit.

#### **40 C.F.R. 64 - Compliance Assurance Monitoring (CAM)**

According to 40 C.F.R. §64.2(a), CAM applies to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria: 1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 C.F.R. §64.2(b)(1); 2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and 3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. 40 C.F.R. §64.2(b)(1)(vi) exempts emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method.

CYTEC Industries Inc. conducted a review of their applicability to 40 C.F.R. 64 – “Compliance Assurance Monitoring” (CAM) for Site Services. The only control devices in Site Services are Scrubbers 226C and 226D which control HCl emissions on E/N Tank C (226X) and E/N Tank B (226Y). Based on the information submitted, Scrubbers 226C and 226D are not subject to the CAM requirements of 40 C.F.R. 64 because the potential pre-control device emissions from E/N Tank C (226X) and E/N Tank B (226Y) are not large enough to be classified as a major source (10 TPY of a single HAP).

#### **Non-Applicability Determinations**

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

- a. 40 C.F.R. 60, Subpart K – “Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.” There are no petroleum liquid storage tanks in the Site Services area constructed within the applicable dates with a design capacity greater than 40,000 gallons.
- b. 40 C.F.R. 60, Subpart Ka – “Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 19, 1978, and Prior to July 23, 1984.” There are no petroleum liquid storage tanks in the Site Services area constructed within the applicable dates with a design capacity greater than 40,000 gallons.
- c. 40 C.F.R. 60, Subpart Kb – “Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.” There are no volatile organic liquid storage tanks in the Site Services area constructed after July 23, 1984 with a design capacity equal to or greater than 75 cubic meters (m<sup>3</sup>).
- d. 40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.” The Site Services area does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.
- e. 40 C.F.R. 60, Subpart DDD – “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.” The Site Services area does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.

- f. 40 C.F.R. 60, Subpart III – “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes.” The Site Services area does not produce any of the chemicals listed in 40 C.F.R. §60.617 as a product, co-product, by-product, or intermediate.
- g. 40 C.F.R. 60, Subpart NNN – “Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations.” The Site Services area does not produce any of the chemicals listed in 40 C.F.R. §60.667 as a product, co-product, by-product, or intermediate.
- h. 40 C.F.R. 60, Subpart RRR - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.” The Site Services area does not produce any of the chemicals listed in 40 C.F.R. §60.707 as a product, co-product, by-product, or intermediate.
- i. 40 C.F.R. 61, Subpart V – “National Emission Standards for Equipment Leaks (Fugitive Emissions Sources).” Applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in the Site Services Area.
- j. 40 C.F.R. 63, Subparts F, G, and H – “National Emission standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (HON).” 40 C.F.R. 63, Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3). The equipment subject to this permit is not an “affected facility,” because such equipment does not manufacture as a primary product any chemical listed in Table 1 of 40 C.F.R. 63, Subpart F.
- k. 40 C.F.R. 63, Subpart DD – “National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations.” The Site Services area does not receive off-site materials as specified in paragraph 40 C.F.R. §63.680(b) and the operations are not one of the waste management operations or recovery operations as specified in 40 C.F.R. §§63.680(a)(2)(i) through (a)(2)(vi).
- l. 40 C.F.R. 63, Subpart JJJ – “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.” The Site Services area does not produce the materials listed in 40 C.F.R. §63.1310.
- m. 40 C.F.R. 63, Subpart PPPP – “National Emission standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.” The Site Services area does not produce an intermediate or final product that meets the definition of “surface coated” plastic part.
- n. 40 C.F.R. 63, Subpart WWWW – “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” The Site Services area does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.
- o. 40 C.F.R. 64 – “Compliance Assurance Monitoring.” Per 40 C.F.R. §64.2(a)(3), emission point 226E is not subject to the CAM Rule because pre-control device emissions are less than 10 tons per year of a single HAP.

- p. 45CSR17 – “To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.” Per 45CSR§17-6.1, CYTEC is not subject to 45CSR17 because the Willow Island Plant is subject to the fugitive particulate matter emission requirements of 45CSR7.
- q. 45CSR27 – “To Prevent and Control the Emissions of Toxic Air Pollutants.” Since the potential emissions to the atmosphere from all sources (point, fugitive, and secondary) at CYTEC’s Willow Island Plant are less than 1,000 lb/yr of formaldehyde, less than 1,000 lb/yr of benzene, and less than 500 lb/yr of acrylonitrile, emission units at the plant are no longer subject to the BAT requirements under 45CSR27, per section 45CSR§27-3.1. Also, per 45CSR§27-3.1, emission units at the plant that emit formaldehyde and benzene would no longer be subject to the BAT requirements of 45CSR27 because the formaldehyde emitting sources are now subject to the requirements of 40 C.F.R. 63, Subpart FFFF and the benzene emitting sources are now subject to the requirements of 40 C.F.R. 63, Subpart GGGGG. Site-wide potential to emit for acrylonitrile is zero because the single process which formerly utilized acrylonitrile was shut down and all equipment was dismantled in 2008.

For the above reasons, the benzene and formaldehyde emission limitations and requirements of R30-10700003-2009 (Part 3 of 4) and R30-10700003-2002 (Part 4 of 5) shall supersede and replace the requirements of Consent Order CO-R27-C-2000-27.

### **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: September 9, 2009  
Ending Date: October 9, 2009

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

Carrie McCumbers  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> 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**

Carrie McCumbers  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1226 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

US EPA, Region III has requested that all annual compliance certifications be submitted electronically (e-mail), therefore Conditions 3.5.3 and 3.5.5 of the Title V Renewal Permit were updated to reflect this change.

The boilerplate language for the 112(j) case-by-case industrial, commercial, institutional boilers and process heaters MACT was updated as a result of the September 10, 2009 amendment to the order by the United States District Court for the District of Columbia. Changes were made to both the Fact Sheet (Other Changes to the Title V Permit, Item No. 5) and Condition 6.1.8 of the Title V Renewal Permit.