

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 March 4, 2010.

Permit Number: **R30-05300007-2010**

Application Received: **3/31/2011**

Plant Identification Number: **03-54-053-00007**

Permittee: **ICL-IP America, Inc.**

Facility Name: **Gallipolis Ferry Plant**

Mailing Address: **State Route 2, P.O. Box 1721, Gallipolis Ferry, WV 25515**

Permit Action Number: *MM05* Revised: *July 11, 2011*

Physical Location: Gallipolis Ferry, Mason County, West Virginia
UTM Coordinates: 396.5 km Easting • 4,290.30 km Northing • Zone 17
Directions: From Point Pleasant, drive 6 miles south on Rt. 2. The facility is on the right.

Facility Description

Facility manufactures Aryl and Alkyl Phosphate Esters and other Specialty Chemicals. SIC Code: 2869; 2819; 2899.

Emissions Summary

The following table summarizes the change in potential emissions (tons per year) for this permitting action (MM05).

Pollutant	Current (MM04)	Change (MM05)	Proposed
VOCs	72.20	+ 0.12	72.32

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 168.62 tpy of NO_x (as specified in the renewal Fact Sheet). Due to this facility's potential to emit over 100 tons per year of criteria pollutant, ICL-IP America, Inc. Gallipolis Ferry 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 permitting
	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>)
R13-2438K	May 17, 2011	

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. **Revision of Permit R13-2438J.** Permit R13-2438K was issued by the Director on May 17, 2011. According to the Engineering Evaluation for that permit, the “proposed modification is for the production of E08-16T (1,3,2-dioxaphosphorinane, 5-butyl-5ethyl-2-phenoxy-, 2-oxide) in the R-9 Subunit. No new equipment is being added to effect the production. However, the permittee has estimated that the potential emissions from Unit II will increase by 0.12 tons-VOC/year.” According to the same evaluation, the substantive changes made to permit R13-2438J were:
 - a. The annual emission limit of VOCs was increased by 0.12 TPY in Table 4.1.12.1.

- b. The production of E08-16T (1,3,2-dioxaphosphorinane, 5-butyl-5ethyl-2-phenoxy-, 2-oxide) in the R-9 Subunit in Table 4.1.12.2.

Therefore, the changes have been made in Title V permit conditions 4.1.12.1. and 4.1.12.2.

Non-Applicability Determinations

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

1. **Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule.** The facility has not made any changes that trigger a PSD modification; therefore, the requirements of the GHG tailoring rule are non-applicable.

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

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

Denton B. McDerment, P.E.
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

Denton B. McDerment, P.E.
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

Response to Comments (Statement of Basis)

No comments were received from U.S. EPA.