

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on June 26, 2012.

Permit Number: **R30-09500001-2012**
Application Received: **November 6, 2014**
Plant Identification Number: **03-54-09500001**
Permittee: **MPM Silicones, LLC**
Facility Name: **Sistersville**
Mailing Address: **3500 South State Route 2, Friendly, WV 26146-9720**

Permit Action Number: *SM03* Revised: *Draft/Proposed*

Physical Location: Friendly, Tyler County, West Virginia
UTM Coordinates: 492 km Easting • 4370.5 km Northing • Zone 17
Directions: WV State Route 2 approximately six miles south of Sistersville.

Facility Description

MPM Silicones, LLC, is located approximately six miles south of Sistersville, WV on State Route 2. The Sistersville Plant is located in a rural setting and is situated on approximately 1300 acres of land. The operating areas are situated centrally and encompass approximately 50 acres. The Sistersville Plant is engaged in specialty chemical manufacturing (SIC 2869) and manufactures a broad range of silicone and silane products, plus organic chemical intermediates related to the silanes and silicones products. The site operates 24 hours a day and consists of a number of continuous and batch processes.

This modification is to facilitate replacement of the Diesel Fire Water Pump (installed in 1983) with a new Clarke Model JU6H-UFADQ0-D Diesel Fire Water Pump (Emission Unit: P-1375) which has been permitted under G60-C030A.

Emissions Summary

The following emission changes are associated with this modification:

Pollutant	Change in Potential Emissions (TPY)	New PTE (TPY)
CO	-0.3	51.2
NO _x	-1.4	78.2
PM ₁₀	-0.1	28.7
VOC	-0.1	630.4

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 630.4 TPY of VOC, 69.8 TPY of ethyl chloride, 31.5 TPY of hydrogen chloride, 55.5 TPY of methanol, 48.3 TPY of propionaldehyde, 168.1 TPY of toluene, and 391.82 TPY of aggregate HAPs. 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, MPM Silicones, LLC 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	NSR Permit
	45CSR16	New Stationary Sources
	45CSR30	Operating permit requirement
	45CSR34	Emission Standards for HAPs
	40CFR60, Subpart IIII	CI RICE NSPS
	40CFR63, Subpart ZZZZ	RICE MACT

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the 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)
G60-C030A	12/10/2014	

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," which may be downloaded from DAQ's website.

Determinations and Justifications

40CFR63, Subpart ZZZZ: RICE MACT

The previously installed engine (Emission Unit: P-1375) was subject to 40CFR63, Subpart ZZZZ. In addition to being subject to 40CFR63, Subpart ZZZZ, the new engine is also subject to 40CFR60, Subpart IIII. According to 40 C.F.R. §63.6590(c)(7), compliance with 40CFR63, Subpart ZZZZ for the new engine is achieved through compliance with 40CFR60, Subpart IIII and no further 40CFR63, Subpart ZZZZ requirements apply. Therefore, P-1375 was removed from the citations in conditions 11.1.19, 11.2.2, 11.4.6, 11.5.1, 11.5.2, and 11.5.3 since these conditions include 40CFR63, Subpart ZZZZ requirements that are not applicable to the new engine.

G60-C030A

This permit was revised to facilitate the replacement of the fire pump engine (Emission Unit P-1375). As a result of the revisions to G60-C030A, the following additional changes were made to this Title V permit:

- The emission units table was updated for the new engine.
- Emission limits were added to condition 11.1.16 for P-1375.
- Condition 11.1.21.a was added listing emission standards of 40 C.F.R. §60.4205(c).
- Conditions 11.1.21.b and 11.1.21.e were added requiring the facility to comply with the manufacturer's emission-related written instructions and applicable standards, as specified in 40 C.F.R. §§60.4206 and 4211(a).
- Condition 11.1.21.c was added listing fuel requirements specified in 40 C.F.R. §60.4207(b).
- Condition 11.1.21.d was added requiring a non-resettable hour meter for P-1375, as specified in 40 C.F.R. §60.4209(a).
- Condition 11.1.21.f was added requiring P-1375 to be a certified engine, as specified in 40 C.F.R. §60.4211(c).
- Condition 11.1.21.g was added listing criteria for P-1375 to be considered an emergency engine, as specified in 40 C.F.R. §60.4211(f).
- Condition 11.1.21.h was added requiring a maintenance plan, records of maintenance, and an initial performance test for P-1375 if it is not installed, operated, or maintained according to manufacturer's emission-related instructions, as specified in 40 C.F.R. §60.4211(g)(2).
- Condition 11.3.3 was added listing performance testing requirements for P-1375, as specified in 40 C.F.R. §§60.4212(a), (b), and (c).
- Condition 11.4.9 was added listing recordkeeping requirements for P-1375, as specified in 40 C.F.R. §60.4214(b).

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: March 25, 2015
Ending Date: April 24, 2015

Point of Contact

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

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West Virginia Department of Environmental Protection
Division of Air Quality
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Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478
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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)

Not applicable.