

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 June 26, 2012.

Permit Number: **R30-09500001-2012**
Application Received: **December 14, 2015**
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: *MM02* Revised: *April 12, 2016*

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 update Condition 10.1.5, the Rotary Kiln Incinerator's Operating Parameter Limits (OPL), and Condition 10.1.7, the Rotary Kiln Incinerator's Automatic Waste Feed Cutoffs (AWFC), consistent with the September 2014 Comprehensive Performance Test Report and Notification of Compliance.

Emissions Summary

There is no change in potential emissions associated with this minor modification (MM02).

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:	45CSR30	Operating permit requirement
	45CSR34	Emission Standards for HAPs
	40 C.F.R. Part 63 Subpart EEE	National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors
State Only:	None	

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

The following list of permits is related to this modification:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
N/A		

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

This minor modification (MM02) includes the following changes:

- Condition 10.1.5, the Rotary Kiln Incinerator's Operating Parameter Limits (OPL) were updated.
- Condition 10.1.7, the Rotary Kiln Incinerator's Automatic Waste Feed Cutoffs (AWFC) were updated.

Above revised OPL and AWFC values are consistent with those submitted in the September 2014 "Comprehensive Performance Test Report and Notification of Compliance for the Hazardous Waste Incinerator."

In that report, the company certified that it is in compliance with the emissions standards of 40 CFR 63 Subpart EEE, and the limits on the operating parameters as listed and set forth in the Notification of Compliance ensure compliance with the emissions standards of 40 CFR 63 Subpart EEE. Previously, MPM Silicones demonstrated initial compliance with the final Hazardous Waste Combustor MACT standards by conducting a Comprehensive Performance Test (CPT) on March 5 - 7, 2009 and subsequently submitted a Notification of Compliance. Therefore, Subpart EEE is an existing applicable requirement.

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: N/A

Ending Date: N/A

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478
Beena.j.modi@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)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.