

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 6, 2012.

Permit Number: **R30-10700010-2012**
Application Received: **May 30, 2013**
Plant Identification Number: **03-54-10700010**
Permittee: **SABIC Innovative Plastics US LLC**
Facility Name: **Washington**
Mailing Address: **P.O. Box 68, Washington, WV 26181**

Permit Action Number: *SM02* Revised: Draft/Proposed

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 441.6 km Easting • 4,345.2 km Northing • Zone 17
Directions: South of Washington, WV on State Route 892, Wood County

Facility Description

Thermoplastics Manufacturing Site. This is a three-stage manufacturing facility producing elastomers and thermoplastic resins used in automotive, electronic, and pipe industries among others.

The facility SIC Code: 2821; NAICS Code: 325211.

Emissions Summary

The emission changes associated with this application are shown in the following table:

Pollutant	Change in Potential Emissions(+ or -) TPY
Volatile Organic Compounds (VOC)	+1.4
Carbon Monoxide (CO)	+21.0
Nitrogen Oxides (NO _x)	+25.0
Particulate Matter (PM ₁₀)	+1.9
Total Particulate Matter (TSP)	+1.9
Sulfur Dioxide (SO ₂)	+0.2

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 205.82 TPY of Carbon Monoxide, 494.01 TPY of Nitrogen Oxides, 121.58 TPY of PM₁₀, 741.4 TPY of Volatile Organic Compounds, 407.8 TPY of Styrene, 28.1 TPY of 1,3-Butadiene, 73.7 TPY of Acrylonitrile, 44.3 TPY of Methyl methacrylate, 27.1 TPY of Cumene and 587 TPY of total 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, SABIC Innovative Plastics US 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:	45CSR2	Indirect Heat Exchangers
	45CSR10	Emission of Sulfur Oxides
	45CSR13	Construction permit.
	45CSR30	Operating permit requirement.
	45CSR34	Hazardous Air Pollutants
	40 C.F.R. 63 Subpart DDDDD	Boiler MACT
State Only:	N/A	

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)
R13-2572E	October 29, 2013	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 B" which may be downloaded from DAQ's website.

Determinations and Justifications

This is a significant modification (SM02) application received on May 30, 2013. The significant modification incorporates the requirements of Permit R13-2572D, which was requested to update the applicable requirements of 40 CFR 63 Subpart DDDDD, and Permit R13-2572E which covers the installation of Boiler #7 to replace Boiler #4. Boiler #4 has been removed from the Title V permit though it has yet to be removed from R13-0009B.

1) Emission Units Table Section 1.1

- Boiler #4 was removed from Emission Group 007.
- Boiler #7 was added to Emission Group 007.

2) Section 5.0

- Removed Emission Point ID 04 and added Emission Point ID 08 to the section title.
- In condition 5.1.1. the following changes were made:
 - 5.1.1.a.ii. and 5.1.1.a.iv. (renumbered as 5.1.1.a.iii) were changed in response to changes made in R13-2572D and R13-2572E.
 - 5.1.1.a.iii. was deleted, since it was removed in R13-2572D. Because of the changes made to 40 CFR 63 Subpart DDDDD in the January 31, 2013 amendment to the rule the boiler now has work practice standards and not emission limits.
- In condition 5.1.2. the following changes were made:
 - 5.1.1.a. was deleted, since it was removed in R13-2572D. Because of the changes made to 40 CFR 63 Subpart DDDDD in the January 31, 2013 amendment to the rule, the boiler now has work practice standards and not emission limits.
 - 5.1.1.b. (renumbered as 5.1.1.a) was changed in response to changes made in R13-2572E
- Conditions 5.1.5. and 5.1.7., were removed since they dealt solely with Boiler #4 which is being removed and replaced by Boiler #7.
- Updated the place holder language in condition 5.1.11 due to the 40 CFR 63 Subpart DDDDD amendment and removed Boiler #4 from the condition citation.
- Removed Boiler #4 from conditions 5.1.12. and 5.1.13.
- Added conditions 5.1.15., 5.1.16., and 5.1.17 which correspond to conditions added in R13-2572E.
- Removed Boiler #4 from condition 5.2.3.
- Added Boiler #7 to condition 5.2.5.
- Removed conditions 5.2.6. and 5.3.2. because the corresponding conditions were removed in R13-2572D.
- Removed Boiler #4 from condition 5.4.4.
- Updated condition 5.4.7. to include recordkeeping of tune-up information as was done in R13-2572D.
- Made 5.5.1. exclusive to Boiler #5 as was done in R13-2572D.
- Removed conditions 5.5.2., 5.5.3., and 5.5.4. because the corresponding conditions were removed in R13-2572D.
- Added a new condition 5.5.2 which corresponds to condition 4.5.2. of R13-2572E.

45CSR2 - Indirect Heat Exchangers – New Boiler # 7 is natural gas fired and less than 100 mmBtu/hr capacity. According to 45CSR§§2-8.4.b and c, Boiler # 7 is exempt from 45CSR§§2-8.1.a (Testing) and 8.2 (Monitoring) requirements. According to 45CSR§2A-3.1.a, Boiler # 7 is exempt from 45CSR§§2A-5 (Testing) and 6 (Monitoring) requirements. 45CSR2 and 45CSR2A only requires recording of the amount of natural gas consumed each month for natural gas fired boilers according to condition 5.2.5 of the permit.

45CSR10 – Emission of Sulfur Oxides - New Boiler # 7 is natural gas fired. According to 45CSR§10-10.3, Boiler # 7 is exempt from 45CSR§10-8 (Testing, Monitoring, Recordkeeping and Reporting) requirements.

40CFR64 – Compliance Assurance Monitoring (CAM) – New Boiler No. 7 does not have any control device – hence CAM is not applicable.

40CFR60, Subpart Dc: *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

Subpart Dc generally applies to boilers with a maximum design heat input (MDHI) between 10 and 100 mmBtu/hr that meet the definition of a “steam generating unit” for which construction, modification, or relocation is commenced after June 9, 1989. Boiler # 7 is not subject to 40 C.F.R. 60 Subpart Dc under the applicability requirements of 40 C.F.R. §60.40c(a) because it was constructed in 1985, relocated to the facility, and not modified or reconstructed.

40CFR63, Subpart DDDDD:

This facility is a major source of HAPs. According to 40 C.F.R. § 63.7485, Boilers # 5, 6, and 7 are subject to this subpart. Boilers #5, 6, and 7 are classified as existing gas boilers. The following are the requirements:

Work Practice Standards - 40 C.F.R. § 63.7500(a)(1) and Table 3 of 40CFR63 Subpart DDDDD – Annual tune-ups as specified in Section 5.1.16. of the permit for Boilers # 5, 6 and 7. A one time energy assessment as specified in condition 5.1.17.

Recordkeeping - 40 C.F.R. §§ 63.7540(a)(10)(v.) and 63.7555 – Section 5.4.7 of the permit for Boilers # 5, 6, and 7.

Non-Applicability Determinations

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

Greenhouse Gas Permitting – This significant modification has not triggered a PSD permit. Therefore, there are no applicable GHG requirements.

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: December 16, 2013
Ending Date: January 15, 2014

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

Robert Mullins
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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.