

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 the Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on November 5, 2013.

Permit Number: **R30-05100009-2013**
Application Received: **October 26, 2015 (MM01)**
Plant Identification Number: **051-00009**
Permittee: **Covestro LLC**
Facility Name: **New Martinsville Facility**
Mailing Address: **17595 Energy Road, Proctor, WV 26055**

Permit Action Number: MM01 Revised: December 22, 2015

Physical Location: Natrium, Marshall County, West Virginia
UTM Coordinates: 514.50 km Easting • 4397.50 km Northing • Zone 17
Directions: The plant is approximately seven (7) miles north of New Martinsville on WV State Route 2.

Facility Description

The New Martinsville facility is an integrated chemical plant whose primary purpose is to produce isocyanates, polyesters, polyethers, and acrylics. The majority of the production units in this plant are involved with the production of polyurethane products (isocyanates and polyols).

Emissions Summary

There are no changes in emissions as a result of this modification.

Title V Program Applicability Basis

With the proposed changes associated with this permitting action, this facility maintains the facility-wide potential to emit over 100 tons per year of criteria pollutants. Therefore, Covestro New Martinsville Facility 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 45CSR34 40CFR63, Subpart EEE	Operating permit requirement. Emission Standards for Hazardous Air Pollutants National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors
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>)
N/A	N/A	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

40CFR63, Subpart EEE - National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors

The facility performed a new performance test during the fourth quarter of 2014 for the fluidized bed incinerator (033-040). The results and the new Notification of Compliance were submitted to both EPA and WVDEP in March 2015. This results in revised fluidized bed incinerator cutoffs in Condition 5.1.15 and operating parameter limits in Condition 5.1.17.

Miscellaneous

The facility name has been changed from Bayer MaterialScience LLC to Covestro LLC. The Permittee has a new mailing address and physical address (even though the facility has not moved location). These

changes have been updated in the Permit including, but not limited to Condition 3.7 and Attachments A and 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: N/A

Ending Date: N/A

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

Michael Egnor

Engineer

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

Michael Egnor

West Virginia Department of Environmental Protection

Division of Air Quality

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Charleston, WV 25304

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Response to Comments (Statement of Basis)

N/A