

# 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: **June 22, 2012**  
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: *MM08*    Revised: *January 23, 2013*

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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.

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### Facility Description

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

The purpose of this minor modification is to incorporate the changes permitted in R13-24380.

### Emissions Summary

The following table summarizes the change in potential emissions (units of tons per year) for the facility. The PTEs for previous changes permitted in this permit term are also given for informational purposes.

Permitting Action	VOC	PM	HAPs
Renewal (2010)	67.43	8.92	21.081 <sup>5</sup>
MM01	+4.40	+0.02	+0.02 (HCl)
MM02	0	0	0
MM03	+0.37	+0.001	+0.04 (Phenol)
MM04	0	0	0
MM05	+0.12	0	0
MM06 <sup>1,2</sup>	-11.0	-0.018	-0.14
MM07 <sup>1,3</sup>	-10.81	-0.017	-0.053
<b>(current permitted total)</b>	<b>(50.51)</b>	<b>(8.906)</b>	<b>(20.948)</b>
MM08 <sup>1,4</sup>	+0.32	0	See Note 6
<b>Proposed</b>	<b>50.83</b>	<b>8.906</b>	<b>20.948</b>

<sup>1</sup> The changes in PTE are transcribed from the respective minor modification applications.

<sup>2</sup> MM06 is associated with permits R13-2438L and M.

<sup>3</sup> MM07 is associated with permit R13-2438N.

<sup>4</sup> MM08 is associated with permit R13-2438O.

<sup>5</sup> This value is the sum of all speciated HAPs listed in the renewal permit Fact Sheet. No single HAP has a PTE greater than 10 tpy.

<sup>6</sup> For the operational flexibility changes permitted in R13-2438O that are being incorporated into the operating permit under MM08, aggregate HAP emissions (composed of ethylene oxide and ethylene dichloride) decrease by 0.38 tpy (cf. Engineering Evaluation for R13-2438O). However, the facility PTE does not decrease since the equipment is not always operated in this manner.

### 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<sub>x</sub> (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> )
R13-2438O	11/30/2012	

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

**Revision of Permit R13-2438N (Title V MM08).** Permit R13-2438O was issued by the Director on 11/30/2012. According to the description on page 1 of R13-2438O, the purpose of the permit revision is to "Increase the operational flexibility of Unit II to better facilitate the production of Fyrol PNX. Specifically, [it is] to (1) Use existing reactor systems R-12 and/or R-13 to produce reagent and technical grades of Fyrol PNX.; and (2) Use reactor system R-35 as a distillation step in the reagent grade process." Based on changes in the underlying permit, the following changes are made in the operating permit:

- a. Emission units R-13 and R-35 are added to the emission units table (subsection 1.1.) under Unit II Fyrol 99.
- b. The VOCs limit in condition 4.1.12.1 is increased from 1.72 tpy to 2.04 tpy.

### 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: Not Applicable for minor modifications.  
Ending Date: N/A

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

Denton B. McDerment, PE  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> 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, PE  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> 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.