

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 April 16, 2013.

Permit Number: **R30-07300030-2013**

Application Received: **October 9, 2014**

Plant Identification Number: **03-54-07300030**

Permittee: **Allnex USA Inc.**

Facility Name: **Willow Island Plant**

Mailing Address: **252 Heilman Avenue, Willow Island, WV 26134**

Permit Action Number: *MM01* Revised: *January 21, 2015*

Physical Location:	Willow Island, Pleasants County, West Virginia
UTM Coordinates:	474.00 km Easting • 4,356.00 km Northing • Zone 17
Directions:	From Interstate 77, Exit 179, take State Route 2 north approximately 10 miles. Plant site is on the left (river side) of State Route 2, two miles south of Belmont, WV.

Facility Description

The facility was formerly the Urethanes Manufacturing Unit (part 1 of 4) under the CYTEC Industries' operating permits. However, at the recent permit renewal the name was changed to AI Chem & Cy US AcquiCo, Inc. since CYTEC no longer owns the unit. The unit manufactures aliphatic isocyanates for use in industrial coatings, adhesives, textiles and elastomers. The automotive industry is a major user of these products. According to the modification application, the facility is characterized by NAICS Code 325199.

Minor Modification MM01

The permittee proposes to remove the Vacuum Water Caustic Treatment Tank (Em. Unit ID: V160) from the vent header that is routed to control device K360 (Em. Pt. ID: UAM-003). This tank will be designated as Standby Storage Tank (Em. Unit ID: V160) and vented to a new vent point (Em. Pt. ID: USM-012). The Standby Storage Tank (Em. Unit ID: V160) is currently not in use.

Emissions Summary

According to Attachment S of the application there is no change in potential emissions associated with the proposed changes.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 285.51 tpy of Volatile Organic Compounds (VOC), 57.87 tpy of Methanol, 61.26 tpy of Methyl Isobutyl Ketone, 66.37 tpy of Toluene, 20.43 tpy of Triethylamine, and 212.84 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, Allnex USA Inc. 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	Permits for construction/modification
	45CSR30	Operating permit requirement.

State Only:	None
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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 (<i>if any</i>)
R13-2473J	11/21/2014	

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

- I. **45CSR13, Permit No. R13-2473J.** Based upon the changes permitted in R13-2473J, the following revisions are made in the Title V permit:
- a. Emission Units table (permit subsection 1.1.) – The tank identified as emission unit V160 has been relocated such that it is no longer associated with control device K360 and emission point ID UAM-003, but instead stands alone as the Standby Storage Tank V160 with new emission point ID USM-012. According to the application, the Standby Storage Tank V160 with new emission point ID USM-012 is currently inactive. This explains why the NSR permit did not place limits on the source and no changes appear in Title V section 4.0 and Appendix A for this permitting action.
 - b. Condition 3.1.11. – The most recent underlying permit revisions were added to the list of preceding permits.
- II. **Miscellaneous Changes.**
- a. On page 2, the permittee name was changed from “AI Chem & Cy US AcquiCo, Inc.” to “Allnex USA, Inc.”
 - b. On page 2, the street address was changed from “#1 Heilman Avenue” to “252 Heilman Avenue”.

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

Point of Contact

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

Denton B. McDerment
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478
denton.b.mcderment@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)

No comments were received from U.S. EPA.