

West Virginia Department of Environmental Protection  
Division of Air Quality

# 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 August 31, 2010.

Permit Number: **R30-07300003-2010**  
Application Received: **February 10, 2012**  
Plant Identification Number: **03-54-07300003**  
Permittee: **CYTEC Industries Inc.**  
Facility Name: **Willow Island Plant**  
Manufacturing Unit: **Polymer Additives (Part 4 of 4)**  
Mailing Address: **1 Heilman Avenue, Willow Island, WV 26134-9801**

Permit Action Number: *MM04*      Revised: *June 12, 2012*

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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 for approximately 10 miles. Plant site is on the left (river side) of State Route 2, two miles south of Belmont, WV.

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### Facility Description

CYTEC Industries is a global, research-based specialty chemical company. The company operates a multi-product, multi-process chemical plant at Willow Island, WV. The Polymer Additives Manufacturing Unit manufactures ultraviolet light absorbers, antioxidants and anti-static agents. The light absorbers are used in all types of plastics (bottles, telephones, lawn furniture, auto parts), in coatings, and in sunscreens. Antioxidants are used in man-made fibers, rubber products, plastics, and in medical applications. Anti-static agents are used in the electronics industry, in copy machine toner, and in textile applications.

CYTEC is required by condition 4.5.5 to submit written notification of any revisions of the Building 82 (Polymer Additives) Manufacturing Unit equipment/emission units, control devices or emission points by August 15<sup>th</sup> for the calendar semi-annual time period of January 1<sup>st</sup> through June 30<sup>th</sup>, and by February 15<sup>th</sup> for the calendar semi-annual time period of July 1<sup>st</sup> through December 31<sup>st</sup> in which the revision occurred. On February 10, 2012, CYTEC submitted a combined Class II administrative update, R13-2156P, and a Title V minor modification permit, R30-07300003-2010 (Part 4 of 4) (MM04) to incorporate changes which have occurred in the 2nd Half of 2011.

### Emissions Summary

There are no emission rate changes associated with the proposed modification.

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs). Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs), CYTEC Industries 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 45CSR30	Preconstruction permits for minor sources. Operating permit requirement.
State Only:	NA	

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> )
R13-2156P	April 4, 2012	NA

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 Title V minor modification includes the following changes approved under R13-2156P, issued on April 4, 2012:

Section	Revisions																																									
1.0	Deleted the Splitter Bowl, Emission Unit ID 06EY, and Morpholine Head Tank Emission Unit ID 07GX from the HALs Product/Process Area.																																									
	Added (2-9SB4) to the Splitter Bowl with Emission Unit ID 09DX.																																									
	Added the following equipment to the HALs Product/Process Area.																																									
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	12CX	12AE	Splitter Bowl (3-12SB1)	--	--	NA																																				
	Revised the Emission Point ID for Emission Unit ID 20KX, from "24NE" to "20KE" and the Control Device from "20KC" to "NA." These changes were made in the following Product/Process Areas: Triazines, UV2908 and UV-3638IA Purification.																																									
	Revised the Emission Point ID for Emission Unit ID 20LX from "20LE" to "20AE." This change was made in the following Product/Process Areas: Triazines and UV-3638IA Purification.																																									
	Removed a duplicate Emission Unit 22BX. There were two in the Table when only one was needed.																																									
	Deleted the following equipment from the Triazines Product/Process Area:																																									
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1.0	<p>The addition of 20EX was to correct an error from a previous modification.</p> <p>Revised the Emission Point ID for Emission Unit ID 24MX from “24NE” to “24ME.” This change was made in the following Product/Process Areas: Triazines, A425, A2246, CA150, CIP200, UV416, UV2126, UV3638, and UV3638IA Purification.</p> <p>Removed the Vapor Return (Control Device ID 20KC) from the list of control equipment in the following Product/Process Areas: Triazines, UV2908, UV3638IA Purification.</p> <p>Added a Product/Process Area – PHENODUR PR285, PR612 with the following Equipment:</p> <table border="1" data-bbox="570 667 1445 1102"> <thead> <tr> <th>Emission Unit ID</th> <th>Emission Point ID</th> <th>Emission Unit Description</th> <th>Year Installed</th> <th>Design Capacity</th> <th>Control Device</th> </tr> </thead> <tbody> <tr> <td>20CX</td> <td>NA</td> <td>Sparkler Filter</td> <td>--</td> <td>--</td> <td>NA</td> </tr> <tr> <td>20EX</td> <td>20EE</td> <td>Condensate Receiver</td> <td>--</td> <td>--</td> <td>NA</td> </tr> <tr> <td>20FX</td> <td>20DE</td> <td>Vacuum Jet (3-19VJ1)</td> <td>--</td> <td>--</td> <td>NA</td> </tr> <tr> <td>20LX</td> <td>20AE</td> <td>Splitter Bowl</td> <td>--</td> <td>--</td> <td>NA</td> </tr> <tr> <td>20NX</td> <td>20AE</td> <td>UV-1164 Reactor with Condenser 3-20CD1</td> <td>--</td> <td>--</td> <td>NA</td> </tr> <tr> <td>20PX</td> <td>20PE</td> <td>Split Receiver</td> <td>--</td> <td>--</td> <td>NA</td> </tr> <tr> <td rowspan="2">21DX</td> <td>21DE</td> <td>Industrial hygiene hood over UV-1164 Reactor &amp; Strip Kettle</td> <td>--</td> <td>--</td> <td>NA</td> </tr> <tr> <td>20BE</td> <td>Strip Kettle with Condenser 3-22CD1</td> <td>--</td> <td>--</td> <td>NA</td> </tr> <tr> <td>22KX</td> <td>20BE</td> <td>Splitter Bowl</td> <td>--</td> <td>--</td> <td>NA</td> </tr> <tr> <td>22MX</td> <td>22ME</td> <td>Solvent Storage</td> <td>9/1979</td> <td>2,000 gal</td> <td>NA</td> </tr> <tr> <td>24TX</td> <td>24FE</td> <td>Drumming Station</td> <td>--</td> <td>--</td> <td>NA</td> </tr> </tbody> </table> <p>Revised the Emission Point ID of Emission Unit ID 24QX from “24QE” to “24RE” for the following areas: A425, A2246, UV416, UV2126.</p> <p>Removed the Condensate Receiver from Condenser (3-25CD1), Emission Unit ID 24RX, from the Product/Process Areas - A425, A2246.</p> <p>Revised the Control Device on Emission unit 05LX from “05MC” to “NA” in the following Product/Process Areas: A1846, UV2908 and UV3638.</p> <p>Removed the Venturi Scrubber (Control Device ID) from the list of control Equipment for the following Product/Process Areas: A1846, UV2908, and UV3638.</p> <p>Revised the Emission Point ID for Emission Unit ID 24QX from “24QE” to “24GE.” This change was made in the following Product/Process Areas: CA150, CIP200, UV3638 and UV3638IA Purification.</p> <p>Removed the Condensate Receiver from Condenser (3-25CD1), Emission Unit ID 24RX, from the Product/Process Area – CA150.</p> <p>Removed the following equipment from Product/Process Area - CIP200:</p> <table border="1" data-bbox="570 1801 1445 1957"> <thead> <tr> <th>Emission Unit ID</th> <th>Emission Point ID</th> <th>Emission Unit Description</th> <th>Year Installed</th> <th>Design Capacity</th> <th>Control Device</th> </tr> </thead> <tbody> <tr> <td>102X</td> <td>11ME</td> <td>Mother Liquor Tank</td> <td>--</td> <td>--</td> <td>10VC</td> </tr> <tr> <td>111X</td> <td>11ME</td> <td>Mother Liquor Tank</td> <td>--</td> <td>--</td> <td>10VC</td> </tr> <tr> <td>112X</td> <td>11ME</td> <td>Mother Liquor Tank</td> <td>--</td> <td>--</td> <td>10VC</td> </tr> </tbody> </table>						Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device	20CX	NA	Sparkler Filter	--	--	NA	20EX	20EE	Condensate Receiver	--	--	NA	20FX	20DE	Vacuum Jet (3-19VJ1)	--	--	NA	20LX	20AE	Splitter Bowl	--	--	NA	20NX	20AE	UV-1164 Reactor with Condenser 3-20CD1	--	--	NA	20PX	20PE	Split Receiver	--	--	NA	21DX	21DE	Industrial hygiene hood over UV-1164 Reactor & Strip Kettle	--	--	NA	20BE	Strip Kettle with Condenser 3-22CD1	--	--	NA	22KX	20BE	Splitter Bowl	--	--	NA	22MX	22ME	Solvent Storage	9/1979	2,000 gal	NA	24TX	24FE	Drumming Station	--	--	NA	Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device	102X	11ME	Mother Liquor Tank	--	--	10VC	111X	11ME	Mother Liquor Tank	--	--	10VC	112X	11ME	Mother Liquor Tank	--	--	10VC
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Section	Revisions					
	20PX	20PE	Split Receiver	--	--	NA
	Added a Tray Dryer with Emission Point ID 22GE.					
	Revised Emission Point ID and Control Device for Emission Unit ID 25EX from "NA" to "22QE" and "NA" to "24QC" in the following Product/Process Area: CIP200.					
	Removed the following equipment from Product/Process Area – UV416					
	<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device</b>
	24PX	24PE	Vacuum Jets & Hot Well	--	--	NA
	24RX	24RE	Condensate Receiver from Condenser (3-25CD1)	--	--	NA
	Revised the Emission Unit ID of the Industrial hygiene vent hood over drumming station from "DRUM24" to "DRUM22" in Product/Process Area - UV416.					
	Revised the Emission Point ID and Control Device ID of 21AY from "23AE" to "23QE" and "23AC" to "22QC" respectively.					
	Removed the following equipment from Product/Process Area – UV2126.					
	<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device</b>
	23AX	22QE	Industrial hygiene vent on Packer & Drumming Station	--	--	22QC
	Control Devices with IDs 05MC and 20KC were removed from the list of control equipment for Product/Process Area UV2908.					
	The following equipment was removed from Product/Process Area – UV3638:					
	<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device</b>
	2-21CD1	22BE	Condenser	--	--	NA
	2-22CD1	22BE	Condenser	--	--	NA
	DRUM22	22QE	Industrial hygiene vent on Bagger (21WX)	--	--	22QC
	LR-24VJ1	24PE	Vacumm Jet (24PX)	--	--	NA
	The following equipment was added to the Product/Process Area – UV3638:					
	<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device</b>
	22PX	22BE	Vacuum Pump	--	--	NA
	24 TX	24GE	Splitter Bowl	--	--	NA
	25HX	23NE	MIBK Storage	--	--	23HC
	Revised the Emission Unit ID of a Condensate Receiver from "24NX" to "24PX" in the Product/Process Area – UV3638.					
	The following equipment was added to the Product/Process Area – UV3638IA Purification:					
	<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device</b>
	20CX	NA	Sparkler Filter	--	--	NA
	22MX	22ME	Solvent Storage	9/1979	2,000 gal	NA
	24JX	24GE	Splitter Bowl	--	--	NA

Section	Revisions																																			
	The following equipment was removed from the Product/Process Area – UV3638IA Purification:																																			
	<table border="1"> <thead> <tr> <th data-bbox="561 312 675 375">Emission Unit ID</th> <th data-bbox="683 312 797 375">Emission Point ID</th> <th data-bbox="797 312 1122 375">Emission Unit Description</th> <th data-bbox="1122 312 1235 375">Year Installed</th> <th data-bbox="1235 312 1349 375">Design Capacity</th> <th data-bbox="1349 312 1438 375">Control Device</th> </tr> </thead> <tbody> <tr> <td data-bbox="561 386 675 428">20NX</td> <td data-bbox="683 386 797 428">21DE</td> <td data-bbox="797 386 1122 428">Industrial hygiene hood over UV-1164 Reactor&amp; Strip Kettle</td> <td data-bbox="1122 386 1235 428">--</td> <td data-bbox="1235 386 1349 428">--</td> <td data-bbox="1349 386 1438 428">NA</td> </tr> <tr> <td data-bbox="561 428 675 470">20PX</td> <td data-bbox="683 428 797 470">20PE</td> <td data-bbox="797 428 1122 470">Split Receiver</td> <td data-bbox="1122 428 1235 470">--</td> <td data-bbox="1235 428 1349 470">--</td> <td data-bbox="1349 428 1438 470">NA</td> </tr> <tr> <td data-bbox="561 470 675 533">24MX 24QX</td> <td data-bbox="683 470 797 533">24FE</td> <td data-bbox="797 470 1122 533">Industrial hygiene hood over Charge &amp; Heat up kettle (2-24K2) and Strip Kettle (2-24K1)</td> <td data-bbox="1122 470 1235 533">--</td> <td data-bbox="1235 470 1349 533">--</td> <td data-bbox="1349 470 1438 533">NA</td> </tr> <tr> <td data-bbox="561 533 675 564"></td> <td data-bbox="683 533 797 564">NA</td> <td data-bbox="797 533 1122 564">Wet Bin</td> <td data-bbox="1122 533 1235 564">--</td> <td data-bbox="1235 533 1349 564">--</td> <td data-bbox="1349 533 1438 564">NA</td> </tr> </tbody> </table>	Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device	20NX	21DE	Industrial hygiene hood over UV-1164 Reactor& Strip Kettle	--	--	NA	20PX	20PE	Split Receiver	--	--	NA	24MX 24QX	24FE	Industrial hygiene hood over Charge & Heat up kettle (2-24K2) and Strip Kettle (2-24K1)	--	--	NA		NA	Wet Bin	--	--	NA					
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	NA	Wet Bin	--	--	NA																															
2.0	No changes.																																			
3.0	Updated US EPA address in 3.5.3.																																			
4.0	In Table 4.1.4, added another Emission Point ID 12DE and source ID 11AX(2-11K1) for Product or Process Name UV3346, UV3529, UV4593, UV4611, UV4801, UV4802, UV6435, UV6460.  Removed Products or Processes CA150 and UV2126 from Table 4.1.4  To Table 4.1.14. Intermittent Use Equipment: Added 07GX (Tank), and removed 20CX (Sparkler Filter) and 22KX (Splitter Bowl)																																			
Appendix A	Removed Control Devices: 05MC (Venturi Scrubber) and 20KC (Vapor Return line).																																			
Appendix B	Added CAS No. 95-48-7 (o-Cresol) to the Table.																																			

**Non-Applicability Determinations**

There were no non-applicability determinations made as a result of this minor modification.

**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: NA

Ending Date: NA

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 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**

Robert Mullins  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
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**Response to Comments (Statement of Basis)**

NA