

# 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 24, 2012.

Permit Number: **R30-09900010-2012**  
Application Received: **February 18, 2014**  
Plant Identification Number: **03-54-099-00010**  
Permittee: **Braskem America, Inc.**  
Facility Name: **Neal Plant**  
Mailing Address: **200 Big Sandy Road, Kenova, WV 25530**

Permit Action Number: *MM03*    Revised: *September 15, 2014*

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Physical Location:	Kenova, Wayne County, West Virginia
UTM Coordinates:	360.6 km Easting • 4,246.1 km Northing • Zone 17
Directions:	From I-64 take Exit 1. Go south on US 52, approximately 2 miles to the stop sign and turn right. Then take another right at "T" intersection and then go 1/4 mile then turn left just after going through railroad underpass. Make a left after underpass and go one mile to the plant entrance on the right.

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### Facility Description

Braskem America, Inc. (Braskem) operates a polypropylene production facility located in Kenova, WV; the facility is commonly referred to as the Neal Plant. The facility operates under SIC code 2821.

This minor modification incorporates changes associated with the R13-1830K revision to replace the current dust collector [G-8812] controlling PM from Feeder #2, Feeder #3, Feeder #4, Feeder #5, Feeder #6, and Feeder #7 with six (6) passive filter systems for each individual feeder.

### Emissions Summary

There are no changes in potential emissions associated with this 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. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Braskem America, 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, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
	45CSR30	Operating permit requirement.

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> )
R13-1830K	March 25, 2014	
G60-C019	August 3, 2010	

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

This permit modification incorporates the modified R13-1830K permit which replaces the current dust collector [G-8812] controlling PM from Feeder #2, Feeder #3, Feeder #4, Feeder #5, Feeder #6, and Feeder #7 with six (6) passive filter systems for each individual feeder.

- 1) The "Emission Units" table was updated as follows:

- Removed dust collector G-8812 and corresponding emission point 52E.
  - Revised information for Feeders L-8903 through L-8908 (i.e., Feeders #2 through #7) regarding the emission point IDs, year installed/modified and control device identification.
  - Added Filters #2 through #7 and associated information as control devices for Feeders #2 through #7.
- 2) Updated section 1.2 with permit R13-1830K information.
  - 3) Section 5.0 – Deleted 52E and added 76E, 77E, 78E, 79E, 80E, and 81E to the list of emission point IDs.
  - 4) Condition 5.1.2. – Deleted emission Point 52E and revised the emission limits of 74E (52E and 74E were previously combined) in the table. Emission points 76E, 77E, 78E, 79E, 80E, and 81E were added to the table

### **Non-Applicability Determinations**

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

40 CFR Part 64 CAM determinations are not applicable for minor modifications.

### **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:

Frederick Tipane  
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. 1215 • Fax: 304/926-0478  
frederick.tipane@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)**

Not applicable.