

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 original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on June 29, 2005

Permit Number: **R30-10700010-2005 (Part 1 of 5)**
Application Received: **January 26, 2009**
Plant Identification Number: **03-54-10700010**
Permittee: **SABIC Innovative Plastics US LLC**
Facility Name: **SABIC Innovative Plastics**
Mailing Address: **P.O. Box 68, Washington, WV 26181**
Permit Action Number: *MM02*, Revised: July 7, 2009

Physical Location: DuPont Road, Washington, Wood County, West Virginia
UTM Coordinates: 441.60 km Easting • 4345.2 km Northing • Zone 17
Directions: South of Washington on State Route 892, Wood County.

Facility Description

Thermoplastics Manufacturing Site. This is a three-stage manufacturing facility producing elastomers and thermoplastic resins used in automotive, electronic, and pipe industries among others.

The facility SIC Code: 2821, 2822, and 2899

The permit has been changed to reflect the ownership change from "General Electric Company" to "SABIC Innovative Plastics US LLC".

In 2008, the production of finished material (plastic pellets) from resin powder was transferred to a different SABIC Innovative Plastics US LLC (SABIC) facility. Thus, for the time being, SABIC has shut down its finishing operations. To control air emissions from the finishing operations, SABIC routed those emissions to the natural gas-fired Finishing D thermal oxidizer (Control Device I.D. No. 11D-01001). In addition to finishing emissions, emissions from three 30,000-gallon organic liquid storage tanks are also routed to the Finishing D thermal oxidizer. With the temporary cessation of finishing operations at

Washington, the only emissions now being routed to the Finishing D thermal oxidizer are from the three tanks. The Finishing D thermal oxidizer is far larger than necessary to control the tanks' emissions. Thus, its operation is wasteful and generates unnecessary emissions from the combustion of natural gas.

SABIC is requesting permit modifications to allow it to reroute the emissions from the three tanks to an existing, more efficient control device - the catalytic thermal oxidizer (CTO; Control Device I.D. No. 30B-12130) in the latex area- through a closed system of piping that SABIC would need to install. The CTO has unused capacity that can accept the tank's emissions. This change will result in reduced emissions from the tanks because the CTO has higher destruction efficiency than the Finishing D thermal oxidizer. Furthermore, no increase in permitted emissions is required.

This minor modification also incorporates changes in R13 permits due to the issuance of R13-1886E (revision of R13-1886D) and R13-2084C (revision of R13-2084B).

Sections 4.2.1, 4.2.2, 4.4.9 and 4.5.8 have been added to the permit to address monitoring and recordkeeping required by 45CSR§21-37 and 40 C.F.R. 63 Subpart JJJ.

Emissions Summary

No change in PTE due to 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 CO, NO_x, PM₁₀, VOC and SO₂. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, SABIC 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	Operating permit requirement.

State Only:	45CSR§21-37
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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>)
R13-1886E	February 19, 2009	N/A
R13-2084C	February 18, 2009	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

Due to issuance of R13-1886E (revision of R13-1886D), permit conditions 4.1.12, 4.3.1, and 4.4.4 have been changed. A condition 4.5.7 has been added to reflect change in R13-1886E. Also R13-1886D citations were changed to R13-1886E in other applicable permit conditions.

R13-2084B citations were changed to R13-2084C in applicable permit conditions due to issuance of R13-2084C (revision of R13-2084B). Section 4.1.1 is modified to match revisions to R13-2084. Condition 4.4.1 has been deleted because of change in R13-2084C.

During Part 2 Title V prep, the R13-1886 permit was modified twice (C and D) and the reference to 45CSR§21-37 was removed in the R13 permit (in error). Since it is an applicable requirement, this reference to 45CSR§21-37 needs to remain in the Title V permit. It does not need to come from an underlying permit. Sections 4.2.2, 4.4.9 and 4.5.8 have been added to the permit to address monitoring and recordkeeping required by 45CSR§21-37.

Sections 3.7.2.b and 3.7.2.c were corrected because they were wrong in the existing permit.

In Section 4.1.4 citation 45CSR§30-12.7 was added because Storage Tank 009-0V is not listed in permit R13-1886E.

Non-Applicability Determinations

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

N/A

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: Not Applicable for minor modifications

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

U.K.Bachhawat
Title V Permit Writer
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

U.K.Bachhawat
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1256 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.