

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 October 24, 2017.

Permit Number: **R30-09900010-2017**
Application Received: **December 10, 2019**
Plant Identification Number: **03-54-099-00010**
Permittee: **Braskem America, Inc.**
Facility Name: **Neal Plant / Kenova**
Mailing Address: **200 Big Sandy Road, Kenova, WV 25530**

Permit Action Number: *MM01* Revised: *May 19, 2020*

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|--------------------|---|
| Physical Location: | Kenova, Wayne County, West Virginia |
| UTM Coordinates: | 360.60 km Easting • 4246.10 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. |

Facility Description

Braskem America, Inc. (Braskem) owns and operates a polypropylene resin manufacturing facility located in Kenova, WV; the facility is commonly referred to as the Neal Plant. The Neal Plant operates under SIC code 2821. The process to produce polypropylene resin includes a feed purification system, a polymerization process, and a product finishing and shipping area. The Neal Plant's process includes a catalyst preparation system, two reaction loops, a material recovery step, and product extrusion process. The Neal Plant also operates a number of boilers to supply steam to various areas of the facility. The facility has the potential to operate 24 hours a day, 7 days a week.

Emissions Summary

There will be no change in permitted emissions as a result of this modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 209 tons per year of VOC's. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Braskem America, Inc.'s Neal 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 | 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. |
| State Only: | N/A | |

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

The active permits/consent orders affected by this modification are as follows:

| Permit or Consent Order Number | Date of Issuance | Permit Determinations or Amendments That Affect the Permit (<i>if any</i>) |
|--------------------------------|------------------|--|
| R13-18300 | March 13, 2020 | |

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

- 1) “R13-1830M” has been updated to “R13-1830O” in Section 1.2.
- 2) The hourly production limit in Condition 6.1.6 has been increased from 75,000 pounds to 80,000 pounds. There is no associated increase in emissions as a result of this change.
- 3) US EPA’s contact information has been updated in Condition 3.5.3.

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: N/A

Ending Date: N/A

Point of Contact

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

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41255 • Fax: 304/926-0478
michael.egnor@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.