

# 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 September 5, 2018.

Permit Number: **R30-07300030-2018**  
Application Received: **July 2, 2019**  
Plant Identification Number: **073-00030**  
Permittee: **Allnex USA Inc.**  
Facility Name: **Willow Island**  
Manufacturing Unit: **Urethanes**  
Mailing Address: **252 Heilman Avenue, Belmont, WV 26134**

Permit Action Number: *MM01*      Revised: *November 4, 2019*

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Physical Location: Willow Island, Pleasants County, West Virginia  
UTM Coordinates: 473.66 km Easting • 4,356.34 km Northing • Zone 17  
Directions: From Interstate 77, Exit 179, take State Route 2, north approximately 10 miles. Plant site on left (river side) of State Route 2, two miles south of Belmont, WV.

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### Facility Description

Allnex USA Inc. Urethanes unit manufactures aliphatic isocyanates for use in industrial coatings, adhesives, textiles, and elastomers. The automotive industry is a major user of these products.

The purpose of this modification is to facilitate the installation of a Heavies Tank Wagon Loading Point and a new DMF Flush Tank. Both new emission points were added in R13-2473N.

## Emissions Summary

This modification results in the following emission changes:

- +0.1 TPY of VOCs
- +0.1 TPY of Total HAPs

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 59 TPY of Methanol. Due to this facility's potential to emit 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	NSR permit
	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

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>
R13-2473N	August 20, 2019	

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.

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### **Determinations and Justifications**

The following changes were made with this modification:

- The Heavies Tank Wagon Loading Point (Emission Point ID: MEC-014) and the new DMF Flush Tank (Emission Point ID: UDM-001) were added to the Emission Units Table.
- The new emission points were added to the heading for Section 4.0 of this permit.
- VOC and THAP emission limits for these new emission points were added to Appendix A.

### **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:

Rex Compston, P.E.  
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. 1209 • Fax: 304/926-0478  
[Rex.E.Compston@wv.gov](mailto:Rex.E.Compston@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.