

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to the Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on November 5, 2013.

Permit Number: **R30-05100009-2013**
Application Received: **May 10, 2017 (SM01)**
Plant Identification Number: **051-00009**
Permittee: **Covestro LLC**
Facility Name: **New Martinsville Facility**
Mailing Address: **17595 Energy Road, Proctor, WV 26055**

Permit Action Number: SM01 Revised: August 14, 2017

Physical Location: Natrium, Marshall County, West Virginia
UTM Coordinates: 514.50 km Easting • 4397.50 km Northing • Zone 17
Directions: The plant is approximately seven (7) miles north of New Martinsville on WV State Route 2.

Facility Description

The New Martinsville facility is an integrated chemical plant whose primary purpose is to produce isocyanates, polyesters, polyethers, and acrylics. The majority of the production units in this plant are involved with the production of polyurethane products (isocyanates and polyols).

Emissions Summary

There will be an increase of 0.19 TPY of VOC's, 0.06 TPY of 4,4 - Diphenylmethane Diisocyanate (MDI), and less than 0.01 TPY of Ethylene Glycol as a result of this modification.

Title V Program Applicability Basis

With the proposed changes associated with this permitting action, this facility maintains the facility-wide potential to emit over 100 tons per year of criteria pollutants. Therefore, Covestro New Martinsville Facility 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: 45CSR30 Operating permit requirement.

State Only: None

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

The following table lists the permits/consent orders associated with this modification:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
N/A	N/A	PD17-016

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

45CSR30 - Operating Permit Requirements

Covestro is planning to replace the Texin Line #1 extruder (022-570) with a larger one to increase capacity. The Permittee submitted a Permit Determination (PD17-016) which determined that since this extruder did not have 45CSR13 VOC or HAP limits, and since emission rates did not surpass 45CSR13 permitting thresholds, that they would not need to get a 45CSR13 permit for the proposed changes. The Permit Determination did state that it was necessary to submit a 45CSR30 Significant Modification, to change certain non-facility-wide HAP requirements/limits that were placed in the Title V permit to make this facility a synthetic minor for HAP's. The proposed changes to this extruder will involve the following change in emissions for the Texin Line #1 extruder (022-570):

Current Organic Emissions

	lbs/hr	lbs/yr	TPY
4,4-MDI	0.02	92.0	0.05
Non-HAP VOC's	0.03	234.0	0.12
Ethylene Glycol	< 0.01	3.2	< 0.01
Total HAP's	0.02	95.2	0.05
Total VOC's	0.04	329.2	0.17

Proposed Organic Emissions

	lbs/hr	lbs/yr	TPY
4,4-MDI	0.03	197.8	0.10
Non-HAP VOC's	0.06	503.1	0.26
Ethylene Glycol	< 0.01	6.9	< 0.01
Total HAP's	0.03	204.7	0.11
Total VOC's	0.09	707.8	0.36

Net Increase in Organic Emissions¹

	lbs/hr	lbs/yr	TPY
4,4-MDI	0.02	105.8	0.06
Non-HAP VOC's	0.04	269.0	0.14
Ethylene Glycol	< 0.01	3.7	< 0.01
Total HAP's	0.02	109.5	0.06
Total VOC's	0.05	378.6	0.19

¹ – Any discrepancies regarding the net increase in organic emissions are due to rounding.

The increase in emissions will not result in this facility losing its status as a synthetic minor. Condition 3.1.10, which limits the facility to less than 9.4 TPY of any single HAP or 24.4 TPY of total HAPs, will still be met after the issuance of this significant modification.

Changes made as a result of this modification:

- 1) In Condition 8.1.8, increased the combined HAP emission limit for the Texin Extruder Lines #1, #2, and #3 (022-570, 022-814, and 022-890) and associated equipment from 0.2 to 0.24 TPY. Note that although the increase in HAP emissions in the above Table shows an increase of 0.06 TPY, the previous limit of 0.2 TPY was rounded up.
- 2) In Condition 8.4.5, increased the Texin Line #1 emission factor from 0.0135 to 0.029 lbs HAPs/unit produced due to the increased size of the Extruder.
- 3) The capacity of the Texin Line #1 Extruder has been revised in the Equipment Table.

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: June 30, 2017
Ending Date: July 31, 2017

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

Michael Egnor
Engineer
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

Michael Egnor
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Division of Air Quality
601 57th Street SE
Charleston, WV 25304
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Response to Comments (Statement of Basis)

N/A