CYTEC

#1 Heilman Avenue
Willow Island, WV 26134
(304) 665-2422

Received
August 5, 2020
WV DEP/Div of Air Quality

August 5, 2020

Ms. Carrie McCumbers, Title V Program Supv.
Division of Air Quality, DEP
601 57th Street S.E.
Charleston, WV 25304

VIA EMAIL

CYTEC INDUSTRIES INC.
WILLOW ISLAND PLANT
WVDAQ ID NO. 073-00003

REFERENCE: Title V Permit - R30-07300003-2016 (Issued February 9, 2016)
- Polymer Additives (Part 2 of 3)

SUBJECT: Title V Permit – Renewal Application

Dear Ms McCumbers:

Cytec Industries Inc. hereby submits the enclosed application for renewal of the referenced Title V permit. We believe the enclosed renewal application contains the appropriate elements as indicated by the DAQ's "Title V Permit Application Checklist for Administrative Completeness".

The renewal application contains Confidential Business Information (CBI) and as such, includes one copy containing CBI and an additional copy with redaction per the requirements of 45 CSR 31.

The DAQ R13 group has approved the semi-annual update application for R13-2156AG in accordance with Section 4.5.5. All changes related to future permit R13-2156 "AH" should be incorporated by DAQ in this Title V renewal permitting action.

Should you have additional questions regarding this submittal please contact me at 304-665-3439.

Very truly yours,

Cytec Industries Inc.

Brian Schmidt

Brian Schmidt
Environmental Engineer

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WV DEP/Div of Air Quality

Division of Air Quality Permit Application Submittal

Please find attached a permit application for : Cytec Industries Inc,; Willow Island Plant
[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only): 073-00003
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only): R13-2156AG; R30-07300003-2016 (Part 2 of 3)

- Type of NSR Application (check all that apply):
  - ☐ Construction
  - ☐ Modification
  - ☐ Class I Administrative Update
  - ☐ Class II Administrative Update
  - ☐ Relocation
  - ☐ Temporary
  - ☐ Permit Determination

- Type of 45CSR30 (TITLE V) Application:
  - ☐ Title V Initial
  - ☑ Title V Renewal
  - ☐ Administrative Amendment**
  - ☐ Minor Modification**
  - ☐ Significant Modification**
  - ☐ Off Permit Change

****If the box above is checked, include the Title V revision information as ATTACHMENT S to the combined NSR/Title V application.**

- Payment Type:
  - ☐ Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
  - ☐ Check (Make checks payable to: WVDEP – Division of Air Quality)
    Mail checks to:
    WVDEP – DAQ – Permitting
    Attn: NSR Permitting Secretary
    601 57th Street, SE
    Charleston, WV 25304

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

- If the permit writer has any questions, please contact (all that apply):
  - ☑ Responsible Official/Authorized Representative
    - Name: David C. Fenton
    - Email: david.fenton@solvay.com
    - Phone Number: 304-665-3702
  - ☐ Company Contact
    - Name: Brian Schmidt
    - Email: brian.schmidt@solvay.com
    - Phone Number: 304-665-3439
  - ☐ Consultant
    - Name:
    - Email:
    - Phone Number:

CYTEC INDUSTRIES INC.

Received
August 5, 2020
WV DEP/Div of Air Quality

WILLOW ISLAND PLANT

ID NO. 03507300003

CLEAN AIR ACT AMENDMENTS

TITLE V

WVDAQ REGULATION 30

Title V Operating Permit

R30-073-00003-2016

(Part 2 of 3)

2020 Renewal Application

Polymer Additives Unit

CONFIDENTIAL BUSINESS INFORMATION

August 2020

Table of Contents

Document	Paper or Electronic Submittal?
Cover Letter	Electronic
Table of Contents	Electronic
45 CSR 31 – Cover Document	Electronic
Title V Permit Renewal Application Form	Electronic
Attachment A: Site Location Map	Electronic
Attachment B: Plot Plans	Electronic
Attachment C: Process Flow Diagrams	Electronic
Attachment D: Title V Equipment Table	Electronic
Attachment E: Emission Unit Forms	Electronic
Attachment G: Air Pollution Control Device Forms	Electronic
Attachment H: Compliance Assurance Monitoring (CAM) Form	Electronic

Cover Document for Claim of Confidentiality 45CSR31

On behalf of Cytec Industries, Inc. Willow Island plant,

Company Name	Cytec Industries, Inc.	Responsible Official		David C. Fenton
Company Address	1 Heilman Avenue	Confidential Information Designee in State of WV	Name	David C. Fenton
	Willow Island, WV		Title	Site Manager
	26134		Address	1 Heilman Avenue
Person/Title *Submitting* Confidential Information	Brian Schmidt			Willow Island, WV
	Environmental Engineer		Phone	(304) 665-3702
			Fax	(304) 655-3674

Reason for Submittal of Confidential Information:
Process Flow Diagrams are Business Confidential. More detail below.

Identification of Confidential Information	Rationale for Confidential Claim	Confidential Treatment Time Period
1. Process Flow Diagrams	Provide justification that the criteria set forth in § 45CSR31-4.1.a - e have been met. Business Confidential / Trade Secret Data for all Claimed Confidential / Maintain Advantage in Business Competitive Marketplace.	**Permanently** for all Claimed Confidential.

Responsible Official Signature:	
Responsible Official Title:	Site Manager
Date Signed:	

NOTE: Must be signed and dated in **BLUE INK**.

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475
www.dep.wv.gov/daq

Received
August 5, 2020
WV DEP/Div of Air Quality

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

1. **Name of Applicant (As registered with the WV Secretary of State's Office):** Cytec Industries, Inc.	**2. Facility Name or Location:** Willow Island Plant
3. DAQ Plant ID No.: 073 -- 00003	**4. Federal Employer ID No. (FEIN):** 223268660

5. **Permit Application Type:**

- ☐ Initial Permit — When did operations commence? prior to 01/01/1950
- ☑ Permit Renewal — What is the expiration date of the existing permit? 08/09/2020
- ☐ Update to Initial/Renewal Permit Application

6. Type of Business Entity:

☑ Corporation ☐ Governmental Agency ☐ LLC
☐ Partnership ☐ Limited Partnership

8. Number of onsite employees: ~200

7. Is the Applicant the:

☐ Owner ☐ • Operator ☑ • Both

If the Applicant is not both the owner and operator, please provide the name and address of the other party.

9. Governmental Code:

- ☑ Privately owned and operated; 0
- ☐ Federally owned and operated; 1
- ☐ State government owned and operated; 2
- ☐ County government owned and operated; 3
- ☐ Municipality government owned and operated; 4
- ☐ District government owned and operated; 5

10. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☑ • Yes ☐ • No

If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's *"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"* guidance.

11. Mailing Address		
Street or P.O. Box: #1 Heilman Avenue		
City: Willow Island	State: WV	Zip: 26134 - 9801
Telephone Number: (304) 665 - 3439	Fax Number: (304) 665 - 3674	

12. Facility Location		
Street: State Route 2	City: Willow Island	County: Pleasants
UTM Easting: 474.00 km	UTM Northing: 4356.00 km	Zone: ☑ 17 or ☐ 18
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.		
Portable Source? ☐ Yes ☑ No		
Is facility located within a nonattainment area? ☐ Yes ☑ No		If yes, for what air pollutants?
Is facility located within 50 miles of another state? ☑ Yes ☐ No		If yes, name the affected state(s). Ohio
Is facility located within 100 km of a Class I Area[1]? ☐ Yes ☑ No If no, do emissions impact a Class I Area[1]? ☐ Yes ☑ No		If yes, name the area(s).

[1] *Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.*

13. Contact Information		
Responsible Official: David C. Fenton		**Title:** Site Manager
Street or P.O. Box: #1 Heilman Avenue		
City: Willow Island	**State:** WV	**Zip:** 26134 - 9801
Telephone Number: (304) 665 - 3702	**Fax Number:** (304) 665 - 3674	
E-mail address: david.fenton@solvay.com		
Environmental Contact: Brian Schmidt		**Title:** Environmental Engineer
Street or P.O. Box: #1 Heilman Avenue		
City: Willow Island	**State:** WV	**Zip:** 26134 - 9801
Telephone Number: (304) 665 - 3439	**Fax Number:** (304) 665 - 3674	
E-mail address: brian.schmidt@solvay.com		
Application Preparer: Christa Schumacher		**Title:** Senior Consultant
Company: ERM, Inc.		
Street or P.O. Box: 204 Chase Drive		
City: Hurricane	**State:** WV	**Zip:** 25526 -
Telephone Number: (504) 564 - 3585	**Fax Number:** ( ) -	
E-mail address: christa.schumacher@erm.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Polymer Additives	Ultraviolet light absorbers, antioxidants, and anti-static agents	325199	2869
Surfactants	Surfactants for use where surface tension is critical	325613	2843
	including mining flotation processes, oil dispersions,		
	water treating chemicals, paints, carpet backing, and		
	pharmaceuticals.		

Provide a general description of operations.

See attached.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**.

    For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

14.

General Description of operations:

Cytec Industries is a global, research-based specialty chemical company. The company operates a multi-product, multi process chemical plant at Willow Island, West Virginia. The facility in Pleasants County covers nearly 1,000 acres, 250 of which are used for plant operations. Approximately 165 people are employed at the plant to support the operations that are divided into the following three business units: Polymer Additives, Surfactants, and Site Services.

Polymer Additives, the largest business unit, manufactures ultraviolet light absorbers, antioxidants and anti-static agents. The light absorbers are used in all types of plastics (bottles, telephones, lawn furniture, auto parts), in coatings, and in sunscreens. Antioxidants are used in man-made fibers, rubber products, plastics and in medical applications. Anti-static agents are used in the electronics industry, in copy machine toner and in textile applications.

The Surfactants unit manufactures surfactants for use where surface tension is critical. The multipurpose applications include mining floatation processes, oil dispersions, water treating chemicals, paints, carpet backing and pharmaceuticals.

Site Services is responsible for providing the shared services that support the site's manufacturing processes: steam generated by two natural gas-fired boilers, an on-site wastewater treatment plant, emergency generators, fire protection, site security, etc.

All aqueous process wastes from the manufacturing units and all stormwater from the manufacturing areas are treated on-site in a biological wastewater treatment plant. The discharge from the wastewater treatment plant, which is permitted by the WV Division of Water and Waste Management and which is subject to strict discharge limitations, is to the Ohio River. The sanitary wastes are collected and treated in a separate system.

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
☑ SIP	☐ FIP
☑ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☑ NESHAP (45CSR34)	☐ Nonattainment NSR (45CSR19)
☑ Section 111 NSPS	☑ Section 112(d) MACT standards
☐ Section 112(g) Case-by-case MACT	☑ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☑ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☑ 45CSR27 State enforceable only rule
☑ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☑ Emissions Trading and Banking (45CSR28)	☐ **C**ompliance **A**ssurance **M**onitoring (40CFR64)
☐ CAIR NO_x Annual Trading Program (45CSR39)	☐ CAIR NO_x Ozone Season Trading Program (45CSR40)
☐ CAIR SO_2 Trading Program (45CSR41)	

19. Non Applicability Determinations
List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.
See attached.
☑ Permit Shield

19. Non Applicability Determinations ***(Continued)*** *- Attach additional pages as necessary.*

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

See attached.

☑ Permit Shield

19. Non Applicability Determinations

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

a. 40 C.F.R. 60, Subpart K – "Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978."
There are no petroleum liquid storage tanks in the Site Services area constructed within the applicable dates with a design capacity greater than 40,000 gallons.

b. 40 C.F.R. 60, Subpart Ka – "Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 19, 1978, and Prior to July 23, 1984."
There are no petroleum liquid storage tanks in the Site Services area constructed within the applicable dates with a design capacity greater than 40,000 gallons.

c. 40 C.F.R. 60, Subpart Kb – "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984." There are no volatile organic liquid storage tanks in the Site Services area constructed after July 23, 1984 with a design capacity equal to or greater than 75 cubic meters (m3).

d. 40 C.F.R. 60, Subpart VV - "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry." The Site Services area does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.

e. 40 C.F.R. 60, Subpart DDD – "Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry." The Site Services area does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
f. 40 C.F.R. 60, Subpart III – "Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes." The Site Services area does not produce any of the chemicals listed in 40 C.F.R. §60.617 as a product, co-product, byproduct, or intermediate.

g. 40 C.F.R. 60, Subpart NNN – "Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations." The Site Services area does not produce any of the chemicals listed in 40 C.F.R. §60.667 as a product, co-product, by-product, or intermediate.

h. 40 C.F.R. 60, Subpart RRR - "Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes." The Site Services area does not produce any of the chemicals listed in 40 C.F.R. §60.707 as a product, co-product, by-product, or intermediate.

i. 40 C.F.R. 61, Subpart V – "National Emission Standards for Equipment Leaks (Fugitive Emissions Sources)." Applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in the Site Services Area.

j. 40 C.F.R. 63, Subparts F, G, and H – “National Emission standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (HON).” 40 C.F.R. 63, Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
The equipment subject to this permit is not an “affected facility,” because such equipment does not manufacture as a primary product any chemical listed in Table 1 of 40 C.F.R. 63, Subpart F.

k. 40 C.F.R. 63, Subpart DD – “National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations.” The Site Services area does not receive off-site materials as specified in paragraph 40 C.F.R. §63.680(b) and the operations are not one of the waste management operations or recovery operations as specified in 40 C.F.R. §§63.680(a)(2)(i) through (a)(2)(vi).

l. 40 C.F.R. 63, Subpart JJJ – “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.” The Site Services area does not produce the materials listed in 40 C.F.R. §63.1310.

m. 40 C.F.R. 63, Subpart PPPP – “National Emission standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.” The Site Services area does not produce an intermediate or final product that meets the definition of “surface coated” plastic part.

n. 40 C.F.R. 63, Subpart WWWW – “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” The Site Services area does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.

o. 40 C.F.R. 64 – “Compliance Assurance Monitoring.” Per 40 C.F.R. §64.2(a)(3), emission point 226E is not subject to the CAM Rule because pre-control device emissions are less than 10 tons per year of single HAP.

p. 45CSR17 – “To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.” Per 45CSR§17-6.1, Cytec is not subject to 45CSR17 because the Willow Island Plant is subject to the fugitive particulate matter emission requirements of 45CSR7.

q. 45CSR27 – “To Prevent and Control the Emissions of Toxic Air Pollutants.” Since the potential emissions to the atmosphere from all sources (point, fugitive, and secondary) at Cytec’s Willow Island Plant are less than the applicability thresholds, the plant is not subject to BAT requirements under 45CSR27.

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*).

See attached.

☑ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See attached.

Are you in compliance with all facility-wide applicable requirements? ☑ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*).

45CSR6-3.1. & 3.2. Open burning & open burning exemptions.
40CFR61 Subpart M - 61.145, 61.148, and 61.150 and 45CSR§34 Asbestos.
45CSR4-3.1. [State-Enforceable only.] Odors.
45CSR11-5.2. Standby plan for reducing emissions.
WV Code § 22-5-4(a)(14) Emission inventory.
40 CFR Part 82, Subpart F Ozone-depleting substances.
40 CFR Part 68 Risk management plan.
45CSR§13-10.5. Permanent shutdown.
WV Code § 22-5-4(a)(15) and 45CSR13 Stack testing.
45CSR§30-5.1.c.2.A.; 45CSR13, R13-0936, 3.4.1; 45CSR13, R13-2560, 4.4.1. Monitoring information.
45CSR§30-5.1.c.2.B. Retention of records.
45CSR§§30-4.4. and 5.1.c.3.D. Responsible official.
45CSR31, 45CSR§30-5.1.c.3.E. Confidential business information.
45CSR§30-8. Certified emissions statement.
45CSR§30-5.3.e. Compliance certification.
45CSR§30-5.1.c.3.A. Semi-annual monitoring reports.
45CSR§30-5.7 Emergencies.
45CSR§30-5.1.c.3. Deviations.
45CSR30-4.3.h.1.B. New applicable requirement.
45CSR13, R13-2156, 2.14. Suspension of operations.

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45CSR6-3.1. & 3.2. Open burning & open burning exemptions – Compliance is demonstrated by Condition Numbers 3.1.1 & 3.1.2.

40CFR61 Subpart M - 61.145, 61.148, and 61.150 and 45CSR§34 Asbestos – Compliance is demonstrated by Condition Number 3.1.3.

45CSR4-3.1.; 45CSR§30-5.1.c. Odors – Compliance is demonstrated by Condition Numbers 3.1.4 & 3.4.3.

45CSR11-5.2. Standby plan for reducing emissions – Compliance is demonstrated by Condition Number 3.1.5.

WV Code § 22-5-4(a)(14) Emission inventory – Compliance is demonstrated by Condition Number 3.1.6.

40 CFR Part 82, Subpart F Ozone-depleting substances – Compliance is demonstrated by Condition Number 3.1.7.

40 CFR Part 68 Risk management plan – Compliance is demonstrated by Condition Number 3.1.8.
Permanent shutdown – Compliance is demonstrated by Condition Number 3.1.10.

WV Code § 22-5-4(a)(15) and 45CSR13 Stack testing – Compliance is demonstrated by Condition Number 3.3.1.

45CSR§30-5.1.c.2.A.; 45CSR13, R13-0936, 3.4.1; 45CSR13, R13-2560, 4.4.1. Monitoring information – Compliance is demonstrated by Condition Number 3.4.1.

45CSR§30-5.1.c.2.B. Retention of records – Compliance is demonstrated by Condition Number 3.4.2.

45CSR§§30-4.4. and 5.1.c.3.D. Responsible official – Compliance is demonstrated by Condition Number 3.5.1.

45CSR31, 45CSR§30-5.1.c.3.E. Confidential business information – Compliance is demonstrated by Condition Number 3.5.2.

45CSR§30-8. Certified emissions statement – Compliance is demonstrated by Condition Number 3.5.4.

45CSR§30-5.3.e. Compliance certification – Compliance is demonstrated by Condition Number 3.5.5.

45CSR§30-5.1.c.3.A. Semi-annual monitoring reports – Compliance is demonstrated by Condition Number 3.5.6.

45CSR§30-5.7 Emergencies – Compliance is demonstrated by Condition Number 3.5.7.

45CSR§30-5.1.c.3. Deviations – Compliance is demonstrated by Condition Number 3.5.8.

45CSR30-4.3.h.1.B. New applicable requirement – Compliance is demonstrated by Condition Number 3.5.9.

45CSR13, R13-2156, 2.14 Suspension of operations – Compliance is demonstrated by Condition Number 3.5.11.

20. Facility-Wide Applicable Requirements *(Continued)* - *Attach additional pages as necessary.*

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

Completed above.

☑ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/ reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Completed above.

Are you in compliance with all facility-wide applicable requirements? ☑ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

21. Active Permits/Consent Orders		
Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit *(if any)*
Surfactants		
R30-07300003-2017 (Part 1 of 3)	08/21/2017	
R13-2120I	04/07/2015	
Polymer Additives		
R30-07300003-2016 (Part 2 of 3)	02/09/2016	
MM10	04/02/2020	
R13-2156AG	04/02/2020	
Site Services	08/29/2019	
R30-07300003-2019 (Part 3 of 3)		
R13-0936B	06/11/2009	
R13-2560F	02/12/2016	

22. Inactive Permits/Obsolete Permit Conditions		
Permit Number	Date of Issuance	Permit Condition Number
Surfactants		
R13-2120G (& prior versions)	11/30/2010	
Polymer Additvies		
R13-2156AF (& prior versions)	08/08/2019	
R13-190	10/02/1975	
R13-671	08/25/1982	
R13-794	05/23/1985	
R13-1006	05/27/1988	
R13-1018	06/24/1988	
R13-1082B	07/13/2000	
R13-1114B	12/20/2002	
R13-1535C	03/06/2000	
R13-1735	07/15/1994	
Site Services		
R13-0936A (& prior versions)	10/22/2004	
R13-2560E (& prior versions)	09/18/2006	

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	72.83
Nitrogen Oxides (NO_X)	81.97
Lead (Pb)	---
Particulate Matter ($PM_{2.5}$)[1]	17.98
Particulate Matter (PM_{10})[1]	17.98
Total Particulate Matter (TSP)	21.45
Sulfur Dioxide (SO_2)	42.04
Volatile Organic Compounds (VOC)	210.34
Hazardous Air Pollutants[2]	Potential Emissions
Acetonitrile	0.33
Acrylamide	0.01
Acrylic Acid	0.21
Benzene	0.25
Chloroform	0.24
Dimethyl Formamide	2.02
Ethylbenzene	0.26
Formaldehyde	0.48
Hexane	1.92
Hydrochloric Acid	<0.01
Maleic Anhydride	0.18
Methanol	23.47
Methyl Isobutyl Ketone	40.62
Methylene Chloride	0.28
Toluene	65.01
Toluene-2,4-Diisocyanate	<0.01
Triethylamine	7.34

Xylenes (isomers and mixtures)	1.55
Total HAP	143.54
Regulated Pollutants other than Criteria and HAP	Potential Emissions
Non-Exempt CFCs	0.04
Greenhouse Gases (GHGs)	Potential Emissions
Carbon Dioxide (CO_2)	137,009.2
Nitrous Oxide (N_2O)	1.05
Methane (CH_4)	149.46
Hydrofluorocarbons (HFCs)	0.30
Perfluorocarbons (PFCs)	---
Sulfur hexafluoride (SF_6)	---
CO_2 equivalent (CO_2e)	141,489

[1]*$PM_{2.5}$ and PM_{10} are components of TSP.*
[2]*For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.*

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)		
☑	1.	Air compressors and pneumatically operated equipment, including hand tools.
☑	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.
☑	3.	Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
☑	4.	Bathroom/toilet vent emissions.
☑	5.	Batteries and battery charging stations, except at battery manufacturing plants.
☑	6.	Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
☐	7.	Blacksmith forges.
☑	8.	Boiler water treatment operations, not including cooling towers.
☑	9.	Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
☐	10.	CO_2 lasers, used only on metals and other materials which do not emit HAP in the process.
☑	11.	Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
☑	12.	Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
☑	13.	Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
☑	14.	Demineralized water tanks and demineralizer vents.
☑	15.	Drop hammers or hydraulic presses for forging or metalworking.
☑	16.	Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
☐	17.	Emergency (backup) electrical generators at residential locations.
☑	18.	Emergency road flares.
☐	19.	Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO_2, VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:

24. Insignificant Activities (Check all that apply)		
☐	20.	Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27. Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:
☐	21.	Environmental chambers not using hazardous air pollutant (HAP) gases.
☑	22.	Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
☐	23.	Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
☑	24.	Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
☐	25.	Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
☑	26.	Fire suppression systems.
☑	27.	Firefighting equipment and the equipment used to train firefighters.
☑	28.	Flares used solely to indicate danger to the public.
☑	29.	Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
☐	30.	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
☑	31.	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
☐	32.	Humidity chambers.
☑	33.	Hydraulic and hydrostatic testing equipment.
☑	34.	Indoor or outdoor kerosene heaters.
☑	35.	Internal combustion engines used for landscaping purposes.
☐	36.	Laser trimmers using dust collection to prevent fugitive emissions.
☑	37.	Laundry activities, except for dry-cleaning and steam boilers.
☑	38.	Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
☑	39.	Oxygen scavenging (de-aeration) of water.
☑	40.	Ozone generators.

24. Insignificant Activities (Check all that apply)		
☑	41.	Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
☑	42.	Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
☑	43.	Process water filtration systems and demineralizers.
☑	44.	Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
☑	45.	Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
☑	46.	Routing calibration and maintenance of laboratory equipment or other analytical instruments.
☐	47.	Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
☐	48.	Shock chambers.
☐	49.	Solar simulators.
☑	50.	Space heaters operating by direct heat transfer.
☑	51.	Steam cleaning operations.
☑	52.	Steam leaks.
☐	53.	Steam sterilizers.
☑	54.	Steam vents and safety relief valves.
☐	55.	Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
☑	56.	Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
☐	57.	Such other sources or activities as the Director may determine.
☑	58.	Tobacco smoking rooms and areas.
☑	59.	Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table
Fill out the **Title V Equipment Table** and provide it as **ATTACHMENT D**. Enclosed.
26. Emission Units
For each emission unit listed in the **Title V Equipment Table**, fill out and provide an **Emission Unit Form** as **ATTACHMENT E**. Enclosed
For each emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**. Not applicable
27. Control Devices
For each control device listed in the **Title V Equipment Table**, fill out and provide an **Air Pollution Control Device Form** as **ATTACHMENT G**. Enclosed
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**. Enclosed - CAM is not applicable; non-applicability rationale statement included.

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: David C. Fenton	Title: Site Manager

Responsible official's signature:

Signature: _____ Signature Date: _____
(Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:

☑	ATTACHMENT A: Area Map
☑	ATTACHMENT B: Plot Plan(s)
☑	ATTACHMENT C: Process Flow Diagram(s)
☑	ATTACHMENT D: Equipment Table
☑	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☑	ATTACHMENT G: Air Pollution Control Device Form(s)
☑	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

All of the required forms and additional information can be found and downloaded from, the DEP website at www.dep.wv.gov/daq, requested by phone (304) 926-0475, and/or obtained through the mail.