

# 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 6, 2017.

Permit Number: **R30-03900102-2017**  
Application Received: **August 21, 2020**  
Plant Identification Number: **03-54-03900102**  
Permittee: **Covestro LLC**  
Facility Name: **South Charleston Plant**  
Mailing Address: **501 Second Avenue South Charleston, WV 25303**

Permit Action Number: *MM02*      Revised: *December 14, 2020*

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Physical Location:                      South Charleston, Kanawha County, West Virginia  
UTM Coordinates:                      439.65 km Easting • 4,247.00 km Northing • Zone 17  
Directions:                                Traveling on I-64 West from Charleston, take the Montrose Exit (Exit 56) and turn right onto Montrose. Straight ahead is the main plant entrance at the corner of Montrose and MacCorkle Avenue.

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### Facility Description

The Covestro LLC South Charleston plant is a chemical manufacturing facility which produces polyether and polymer polyols. The facility is characterized by SIC and NAICS codes 2869 and 325199, respectively.

#### Proposed Modification

Tank T-1458 is an atmospheric tank in the Preformed Stabilizers (PFS) group, containing Polyols and ISOP, which is fed to the PFS unit.

A new internal Quality Control spec requires lower VOC's and depending on unit status, occasionally the material does not meet this new spec. The Stripping Project now requires Tank T-1458 to be utilized in Polymers 1 (PP1) unit as an intermediate or make tank. Tank T-1458 will contain Polyols material and the

VOCs will be stripped in order to meet the new Quality Control spec. No new chemicals are being introduced and no chemical reactions will take place.

### Emissions Summary

This modification results in the following emission changes:

Originally Tank 1458 contained Isopropyl alcohol (ISOP) and Polyols. Covestro's 2019 SARA report included 184.82 pounds of Isopropyl alcohol (ISOP) and zero (0) pounds of Polyol as fugitive emissions. As a result of this project, Tank 1458 will be an intermediate or make tank for Polyols only; therefore, the emissions will be reduced to zero (0) pounds. Overall, there will be a decrease in VOC emissions of 0.09 TPY.

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 124.0 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Covestro LLC 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
	45CSR30	Operating permit requirement.

State Only: None

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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2561M	October 15, 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**

Tank T-1458 #2 ISOP/Polyol Storage was moved from the Preformed Stabilizers (PFS) section to the Polymer Polyols Emission Group (PMPO) of the section 1.1. Emissions Units table. Tank T-1458 description was changed from #2 ISOP/Polyol Storage to Intermediate or Make Tank.

### **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: Not Applicable for minor modifications.  
Ending Date: N/A

### **Point of Contact**

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

Jonathan Carney, 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. 41247  
Jonathan.W.Carney@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 for proposed minor modifications.