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 November 07, 2017.

Permit Number: R30-09500001-2017
Application Received: April 28, 2022
Plant Identification Number: 03-54-095-00001
Permittee: MPM Silicones, LLC
Facility Name: Sistersville Facility
Mailing Address: 10851 Energy Highway, Friendly, WV 26146-9720

Permit Action Number: MM04 Revised: July 29, 2022

Physical Location: 10851 Energy Highway, Tyler County, West Virginia
UTM Coordinates: 492 km Easting • 4370.5 km Northing • Zone 17
Directions: Facility is located along West Virginia State Route 2 at Long Reach, 6 miles south of Sistersville.

Facility Description
MPM Silicones, LLC is located approximately six miles south of Sistersville, WV on State Route 2. The Sistersville Plant is located in a rural setting and is situated on approximately 1300 acres of land. The operating areas are situated centrally and encompass approximately 50 acres. The Sistersville Plant is engaged in specialty chemical manufacturing (SIC 2869) and manufactures a broad range of silicone and silane products, plus organic chemical intermediates related to the silanes and silicones products. The site operates 24 hours a day and consists of a number of continuous and batch processes.

Emissions Summary
This modification results in the following emission changes:

No change in potential-to-emit (PTE) is expected with the removal of Emission Groups 105: R-23/R-70 and 431: (SPCEU); the removal of control devices S-205, S-237, and E-1353; and the relocation of tanks T-173, T-175, and T-982.
Title V Program Applicability Basis
With the proposed changes associated with this modification, this facility maintains the potential to emit 146.01 tpy of NOx, 633.2 tpy of VOC, 69.80 tpy of ethyl chloride, 31.5 tpy of hydrogen chloride, 55.5 tpy of methanol, 48.3 tpy of propionaldehyde, 168.1 tpy of toluene, and 400.42 tpy of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, MPM Silicones, 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:

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<tr>
<td></td>
<td>45CSR30</td>
<td>Operating permit requirement.</td>
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</table>

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:

<table>
<thead>
<tr>
<th>Permit or Consent Order Number</th>
<th>Date of Issuance</th>
<th>Permit Determinations or Amendments That Affect the Permit (if any)</th>
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<tbody>
<tr>
<td>R13-2338M</td>
<td>May 20, 2022</td>
<td></td>
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<tr>
<td>R13-2338N</td>
<td>May 26, 2022</td>
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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
This minor modification incorporates the revisions made with the Class I Administrative Updates R13-2338M and R13-2338N. The Permit R13-2338M was applied for by the company to remove out-of-service equipment from the Emission Units Table and any relevant requirements in the permit. The equipment to be removed includes the following:

- All equipment in Emission Group 105: R-23/R-70
- All equipment in Emission Group 431: SPCEU
- Control Devices relevant to Emission Groups 105 and 431
  - S-205 – Scrubber which was a control device for Emission Group 105.
  - E-1353 – Flare which was a control device for Emission Group 105.
- S-237 – HCl Water Scrubber which was a control device for Emission Group 431.

Additionally, the following equipment from these groups has been relocated to new Emission Groups:

- T-173 and T-175 have been moved to Emission Group 152: Tank Farm.
- T-982 has been moved to Emission Group 107: K-45.

The Permit R13-2338N was an administrative update filed after the issuance of R13-2338M. The reason for this update was to add equipment that was inadvertently removed from the Emission Units Table back into the permit. The equipment that was added back into the permit were K-17, T-100, T-1246, T-1839, and T-329.

These modifications will not cause any changes in the potential-to-emit (PTE). The permit conditions that were relevant to these devices have been updated or removed from the permit as follows:

1) Section 1.1. – Emission Units Table
   
i. The Emission Units Table has been updated, as reported above. The relevant equipment and all corresponding information have been removed from the Emission Units Table or moved to the appropriate section.

2) Section 1.2. – Active R13, R14, and R19 Permits
   
i. R13-2338M was issued on May 20, 2022. This permit was applied for and issued for the reasons described above. Changes in this permit’s requirements have been included for Sections 1, 3, and 4 and Attachment A of this Title V Permit.

   ii. R13-2338N was issued on May 26, 2022. This permit was applied for and issued for the reasons described above. Changes in this permit’s requirements have been included in Sections 1 and 4 of this Title V Permit.

3) Section 3.7. – Permit Shield
   
i. References to the out-of-service control devices S-205, S-237, and E-1353 have been removed from the determination for the 40 C.F.R. Part 64 (CAM) requirement.

4) Section 4.0. – Silanes Production
   
i. The section heading was updated to show the removal of Emission Group IDs 105 and 431. As indicated in the R13-2338M permit application, Emission Group ID 102 was also removed from the heading. All equipment from these groups have been removed or relocated.

   a. Emission Groups 105 and 431 were removed in the modification described in R13-2338M.

   b. Emission Group 102 was removed in the modification described in R13-2338I.

5) Section 4.1. – Limitations and Standards
   
i. The requirements and table (Table 4.1.2.) found in Condition 4.1.2. have been removed from the permit and replaced with “Reserved”. This condition is no longer applicable to the facility as the flare referenced in the requirement (E-1353) has been removed.

   ii. The requirements in Condition 4.1.5. and Condition 4.1.15. have been replaced with “Reserved”. These conditions are no longer applicable to the facility as Emission Group 431 has been removed.
iii. The emission units E-1353 and S-237 and their corresponding emission limits have been removed from Table 4.1.8: 45CSR7 Source Emission Limits, found in Condition 4.1.8. These requirements are no longer applicable as E-1353 and S-237 have been removed from the facility.

iv. Condition 4.1.11 was updated to omit references to Section 4.1.2. and Emission Point 1038. Neither of these are applicable to this requirement as Section 4.1.2. was removed for the reason described above and Emission Point 1038 was related to the equipment and control devices in the out-of-service Emission Group 105.

Due to changes made in Sections 4.1.3. and 4.1.11. of R13-2338 by version N, the authority of this section has not been changed because Section 4.1.11. was added back into the R13-2338. (See R13-2338N Engineering Evaluation for Details)

6) Section 4.2. – Monitoring Requirements

i. The citation of Condition 4.2.2. was updated to remove the reference to Table 4.1.2. which has been removed from the permit for the reasons described above.

7) Section 4.4. – Recordkeeping Requirements

i. The references to Emission Points 1038 and 4310 were removed from the citation of Condition 4.4.6. The emission units that vented to these points are no longer in use at the facility.

ii. The requirement in Condition 4.4.10. has been replaced with “Reserved”. This condition is no longer applicable to the facility as Emission Group 431 has been removed.

8) Section 4.5. – Reporting Requirements

i. The requirements in Conditions 4.5.6. and 4.5.7. have been replaced with “Reserved”. These conditions are no longer applicable to the facility as Emission Group 431 has been removed.

9) Attachment A – Parametric Monitoring

i. Emission Group 105: R-23/R-70 was removed from the row of Control Device S-174 because the equipment in this group is out-of-service.

ii. The rows for Control Devices S-205, S-237, and E-1353 have each been completely removed from the table as these devices are out-of-service and the monitoring requirements described are no longer applicable.

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

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<th>Beginning Date:</th>
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<tr>
<td>Ending Date:</td>
<td>N/A</td>
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Point of Contact

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

Sarah Barron
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV  25304
304/926-0499 ext. 41915
sarah.k.barron@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)

None.