West Virginia Department of Environmental Protection
Division of Air Quality

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 February 9, 2016.

Permit Number: **R30-07300003-2016**
Application Received: **February 19, 2019**
Plant Identification Number: **03-54-073-00003**
Permittee: **CYTEC Industries, Inc.**
Facility Name: **Willow Island Plant**
Manufacturing Unit: **Polymer Additives (Part 2 of 3)**
Permittee Mailing Address: **1 Heilman Avenue, Willow Island, WV 26134-9801**

Permit Action Number: *MM08* Revised: *June 5, 2019*

Physical Location:	Willow Island, Pleasants County, West Virginia
UTM Coordinates:	474.00 km Easting • 4,356.00 km Northing • Zone 17
Directions:	From Interstate 77, Exit 179, take State Route 2 north for approximately 10 miles. Plant site is on the left (river side) of State Route 2, two miles south of Belmont, WV.

Facility Description

CYTEC Industries is a global, research-based specialty chemical company. The company operates a multi-product, multi-process chemical plant at Willow Island, WV. Plant operations are divided into the following two manufacturing units and one support services unit: Surfactants (Part 1 of 3), Polymer Additives (Part 2 of 3), and Site Services (Part 3 of 3).

The Polymer Additives Manufacturing Unit (Part 2 of 3) 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.

This modification is for the addition of a new process vessel Condensate Receiver (3-13T1) to the A1790 and UV2908 Product/Process Areas; addition of new process vessels Vacuum Jet 1 (RF-10VJ1) with Condenser (RF-10CD1), Vacuum Jet 2 (RF-10VJ2) with Condenser (RF-10CD2), and Hot Well (1-10HW1) to the HALS Product/Process Area; and replacement of an existing 2,000 gallon Reactor (2-24K2) with a 2,500 gallon reactor, which is utilized in multiple Product/Process Areas.

Emissions Summary

There are no changes in this facility's Potential to Emit (PTE) associated with this modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (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 hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs), CYTEC Industries, 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 permitting
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs for Source Categories Pursuant to 40 CFR, Part 63.
	40CFR63, Subpart FFFF	National Emission Standards for Hazardous Air Pollutions: Miscellaneous Organic Chemical Manufacturing (MON)

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)*
R13-2156AE	April 9, 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.

Determinations and Justifications

Emission Units Table Changes
The following equipment was added to the Emission Units Table:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Product/Process Area – HALS (UV3346, UV3529, UV4593, UV4611, UV4801, UV4802, UV6435, UV6460)					
10VX	09AE	Vacuum Jet 1 (RF-10VJ1) with Condenser (RF-10CD1)	2018	--	NA
10VX	09AE	Vacuum Jet 2 (RF-10VJ2) with Condenser (RF-10CD2)	2018	--	NA
10HX	09AE	Hot Well (1-10HW1) for Vacuum Jets (RF-10VJ1 & RF-10VJ2)	2018	--	NA
Product/Process Area – A1790					
13CX	13HE	Condensate Receiver (3-13T1)	2018	--	NA
Product/Process Area – UV2908					
13CX	13HE	Condensate Receiver (3-13T1)	2018	--	NA

There were no other changes made to this permit. Emission point 09AE continues to be subject to the Group 1 Batch Process Vent requirements of 40CFR63, Subpart FFFF.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

N/A

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:

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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.