

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 January 6, 2015.

Permit Number: **R30-07300003-2015**
Application Received: **January 20, 2016**
Plant Identification Number: **03-054-07300003**
Permittee: **CYTEC Industries Inc.**
Facility Name: **Willow Island Plant**
Manufacturing Unit: **Site Services (Part 3 of 3)**
Mailing Address: **#1 Heilman Avenue, Willow Island, WV 26134-9801**

Permit Action Number: *MM01* Revised: *May 17, 2016*

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 Site Services Area (Part 3 of 3) supports the manufacturing processes at the CYTEC facility. Site Services is comprised of the Powerhouse (including two natural gas/distillate oil fired boilers), the on-site biological wastewater treatment system, the Equalization/Neutralization (E/N) wastewater unit operation, a distillate fuel oil storage tank, and emergency diesel engines.

This modification includes updates to the applicable requirements of 40 CFR 60 Subpart Dc approved under R13-2560F and updates to the requirements of 40 CFR 63 Subpart DDDDD approved on November 20, 2015.

Emissions Summary

There is no change in potential emissions associated with this minor modification (MM01).

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 210.25 tpy of VOC; 19.96 tpy of Methanol; 33.34 tpy of Methyl Isobutyl Ketone; 81.84 tpy of Toluene; and 147.41 tpy of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, CYTEC Industries Inc. Willow Island Plant – Site Services 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 45CSR16 45CSR30 45CSR34 40 CFR 60 Subpart Dc 40 CFR 63 Subpart DDDDD	Permits for construction/modification Emission standards for New Stationary Sources pursuant to 40 C.F.R. Part 60 Operating permit requirement. Emission standards for HAPs Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units National Emission Standards For Hazardous Air Pollutants: Major Source Boiler MACT
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 <i>(if any)</i>
R13-2560F	February 12, 2016	

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

- Condition 6.4.2 was updated to incorporate changes to condition 4.1.17 of R13-2560F. The changes to the requirements in Section 4.1.17. of R13-2560F were requested in order to update the applicable requirements from 40 CFR 60 Subpart Dc to reflect the current version of Subpart Dc. In addition, the company wanted the definition of distillate oil removed from the body of the permit, because the definition is subject to change within Subpart Dc. Cytec wanted only a reference to the definition. The only change to the Title V permit as a result of the changes approved under R13-2560F was the removal of the definition of distillate oil in condition 6.4.2.
- Conditions 6.4.6, 6.4.7, 6.5.2 and 6.5.4 were updated to include changes to 40 CFR 63 Subpart DDDDD approved on November 20, 2015.

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: N/A
Ending Date: N/A

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478
Beena.j.modi@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)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.