

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: **January 3, 2019**
Plant Identification Number: **03-54-039-00102**
Permittee: **Covestro LLC**
Facility Name: **South Charleston Plant**
Mailing Address: **501 Second Avenue, South Charleston, WV 25303**

Permit Action Number: *MM01* Revised: *April 16, 2019*

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.

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

NSR permit R13-2561L made provision for revised operation of carbon treaters C-2090 and C-2090B to increase the maximum annual propylene oxide (PO) feed rate to the boilers.

Emissions Summary

According to the application there are no changes to emissions associated with the proposed changes.

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 (<i>if any</i>)
R13-2561L	January 24, 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

45CSR13, Class II Administrative Update Permit No. R13-2561L. Based upon the permitted revisions in R13-2561L, the following changes have been made in the proposed operating permit:

1. The emission unit ID (C-2090A only), emission point IDs, emission unit descriptions, and control device IDs have been revised for C-2090A and C-2090B in the Emission Units Table in Section 1.1. The design capacities of the carbon treater have been added based upon information provided in application Attachment I. The emission point ID and control device are "None" for normal operation since there are no air emissions during routine operation due to flow into the carbon treater being equal to flow out of the carbon treater, according to application Attachment L.
2. The alphabetic suffix and issue date have been updated in the Active Permits Table in Section 1.2.

3. C-2090A has been changed to C-2090 in the non-applicability determination for 40 C.F.R. 63 Subpart EEEE in section 3.7.2. to reflect the change in Section 1.1.
4. The annual feed rate has been changed from 57.6 to 88.0 tons, and the second paragraph has been added to condition 7.1.3.

45CSR13 Rule Revision. The citation of authority in condition 5.1.4. has been changed from 45CSR§13-5.11. to 45CSR§13-5.10. as a result of removing section 5.8 of 45CSR13, effective June 1, 2017.

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:

Denton B. McDerment, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478
denton.b.mcderment@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)

No comments were received from U.S. EPA. However, after the modification went to proposed status, the U.S. EPA address in condition 3.5.3. was revised for the final permit modification.