

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 August 6, 2024.

Permit Number: **R30-05100009-2024**
Application Received: **May 19, 2025**
Plant Identification Number: **03-54-051-00009**
Permittee: **Covestro LLC**
Facility Name: **New Martinsville Facility**
Mailing Address: **17595 Energy Road**
Proctor, WV 26055

Permit Action Number: *MM01* Revised: *August 12, 2025*

Physical Location:	Natrium, Marshall County, West Virginia
UTM Coordinates:	514.50 km Easting • 4397.50 km Northing • Zone 17
Directions:	The plant is approximately seven (7) miles north of New Martinsville on WV State Route 2.

Facility Description

The New Martinsville facility is an integrated chemical plant whose primary purpose is to produce isocyanates, polyesters, polyethers, and acrylics. The majority of the production units in this plant are involved with the production of polyurethane products (isocyanates and polyols).

Emissions Summary

This modification results in the following emission changes:
The potential to emit (PTE) of VOCs at the facility was reduced by 0.6 tpy.

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 Carbon Monoxide, Nitrogen Oxides, and Volatile Organic Compounds. 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	Construction permit requirement
	45CSR30	Operating permit requirement.

State Only:	N/A
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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:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-3463	01/24/2020	Permit Rescinded on 01/13/2025

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

The purpose of MM01 is to remove conditions pertaining to the rescinded permit R13-3463 and to modify the operating parameter limits based on the Combustion MACT (40 C.F.R. Part 63, Subpart EEE) performance test results from September 2024.

This modification required the following changes to the Title V Permit:

- Section 1.0
 - Equipment from former permit R13-3463 was removed from the Emission Units Table

- Permit R13-3463 was removed from Table 1.2.
- Section 3.0
 - The citation for boilerplate condition 3.1.6 was updated.
 - R13-3463 was removed from condition 3.1.9.
 - Boilerplate condition 3.3.1.b and the citation for condition 3.3.1 were updated.
- Section 5.0
 - Operating parameter limits in conditions 5.1.15 and 5.1.17 were updated based on Combustion MACT performance test data.
- Sections 12, 13, and 14 were removed from the permit with the rescinding of R13-3463.

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:

Nikki B. Moats
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/414-1282
Nikki.b.moats@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.