

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 March 23, 2021.

Permit Number: **R30-07300003-2021**

Application Received: **February 14, 2023**

Plant Identification Number: **03-54-073-00003**

Permittee: **Cytec Industries, Inc.**

Facility Name: **Willow Island Plant – Polymer Additives (Part 2 of 3)**

Mailing Address: **1 Heilman Avenue, Willow Island, WV 26134-9801**

Permit Action Number: *MM04* Revised: *June 12, 2023*

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. The plant site is on the left (river side) of State Route 2, two miles south of Belmont, WV.

Facility Description

Cytec Industries, Inc. is a global research-based specialty chemical company. The company operates a 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, anti-static agents, depressant reagents, and phenolic resins. 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.

Emissions Summary

This modification does not increase emissions.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 210.34 tpy of Volatile Organic Compounds (VOCs), 23.47 tpy of Methanol, 40.62 tpy of Methyl Isobutyl Ketone, 65.01 tpy of Toluene, and 143.54 tpy of aggregate Hazardous Air Pollutants (HAPs). Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate 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	Construction Permit Requirements
	45CSR30	Operating permit requirement.

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>)
R13-2156AL	March 14, 2023	

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 within the Class I Administrative Update R13-2156AL. This revision is for replacing the Methanol Drown Tank (3-17T1) with a 2,000 gallon tank.

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

- Section 1.0

- The Emission Units Table was updated with the new installation year and design capacity of the Methanol Drown Tank. Emissions from the new tank are controlled by vapor return.
- The Methanol Drown Tank (17AX, 17AE) was inadvertently left out of the control device table for vapor return (18VC, 11VC) in R13-2156AL, but has been added to the Emission Units table of the Title V permit.
- Table 1.2 was updated since R13-2156AL supersedes and replaces R13-2156AK.
- Sections 2.0 and 3.0
 - Condition 2.1.3 was updated since 45CSR30 changed which section defines Secretary and the word “such” was removed.
 - Conditions 2.17, 3.5.7, and 3.5.8.a.1 – The sections for Emergency were removed and replaced with Reserved due to Section 5.7 of 45CSR30 being removed.
 - Condition 3.5.4 was changed since under the revised 45CSR30, certified emission statements are no longer required to be submitted. Facilities have been submitting their emission data in SLEIS and paying fees based on their SLEIS submittal, so this requirement was no longer necessary.
 - Condition 3.5.8.a.2 was updated since in the revised 45CSR30, “telefax” was replaced with “email”.

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:

Nikki B. Moats
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41282
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.