

# 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 12, 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: *MM05*    Revised: *May 6, 2024*

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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.

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### **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, Cytex 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.    |
| State Only:        | N/A     |                                  |

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> ) |
|--------------------------------|-------------------|--|
| R13-2156AM                     | February 22, 2024 |  |

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 R13-2156AM for the following:

- Replacement of the 2,000-gallon Waste Hold Tank (1-7T5; 07BX,07BE) with a 3,964-gallon Waste Hold Tank to perform the same function. The throughput to this tank will not change. The tank was replaced (November 27, 2023 through December 18, 2023) due to old age.
- Installation of a 1,454-gallon Knockout Pot (3-8T1; 08NX, 08NE) to capture excess fluids that may get past the existing condenser. The fluids from the knockout pot will be directed back to the process. The new Knockout Pot was replaced November 27, 2023 through December 18, 2023.

This resulted in the following changes to the Title V permit:

### 1.1 Emission Units

- Update to the installation date and design capacity of emission unit 07BX.
- Update to the emission point IDs of Emission Units 07KX, 07NY, and 58AX due to the vent being moved from bay 7 (07NE) to bay 8 (08NE).
- Added emission Unit 08NX for the new 1,454-gallon Knockout Pot.

### 2.0 General Conditions

- No changes to this Section.

### 3.0 Facility-Wide Requirements

- Added “shall” to condition 3.5.4. This was inadvertently deleted in a previous modification.

### 4.0 Source-Specific Requirements

- No changes to this Section.

## 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:

Robert Mullins  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/926-0499 ext. 41286  
Robert.A.Mullins@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.