

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 June 06, 2023.

Permit Number: **R30-07300030-2023**
Application Received: **August 02, 2023**
Plant Identification Number: **03-54-07300030**
Permittee: **Allnex USA Inc.**
Facility Name: **Willow Island Plant**
Mailing Address: **252 Heilman Avenue, Belmont, WV 26134**

Permit Action Number: *MM01* Revised: *November 14, 2023*

Physical Location: Willow Island, Pleasants County, West Virginia
UTM Coordinates: 473.66 km Easting • 4,356.34 km Northing • Zone 17
Directions: From Exit 179 of Interstate 77, take State Route 2 north for approximately ten miles. The plant site is on the left (river side) of State Route 2, approximately two miles south of Belmont, WV.

Facility Description

Allnex USA Inc.'s Urethanes unit manufactures aliphatic isocyanates for use in industrial coatings, adhesives, textiles, and elastomers. The automotive industry is a major user of these products.
NAICS: 325998, 325199; SIC: 2899, 2869

This minor modification incorporates the revisions made with the Class II Administrative Update Permit R13-24730. The changes associated with the modification include the installation of two new reactant storage tanks (V008 and V011), the addition of a trailer loading area beside the new tanks (V201), the installation of new equipment for automatically filling pails with TMXDI and TMI products (U003), and the removal of an out-of-service reactant storage tank cooler (E013).

Emissions Summary

This minor modification resulted in the facility-wide potential emissions of volatile organic compounds (VOCs) increasing by 0.3 tpy.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 59.05 tpy of methanol and 62.57 tpy of total hazardous air pollutants (HAPs). Due to this facility's potential to emit over 10 tons per year of a single HAP and over 25 tons per year of aggregate HAPs, Allnex USA 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	NSR Permit Requirements.
	45CSR30	Operating Permit Requirements.

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
R13-24730	September 12, 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 with the Class II Administrative Update R13-24730. The changes associated with the modification include the installation of two new reactant storage tanks (V008 and V011), the addition of a trailer loading area beside the new tanks (V201), the installation of new equipment for automatically filling pails with TMXDI and TMI products (U003), and the removal of an out-of-service reactant storage tank cooler (E013).

The following changes have been made to the Title V operating permit for this modification:

1. Section 1.0. – Emission Units and Active R13, R14, and R19 Permits

- a. The following changes have been made to the Emission Units Table:
 - i. The storage tank cooler E013 is out-of-service and has been removed from the table. The storage tank cooler did not vent directly to the atmosphere and did not have any applicable requirements in the operating permit.
 - ii. The two 225,000-gallon reactant storage tanks V008 and V011 have been added to the table. The new emission points DIP-002 and DIP-003 will be created for V008 and V011, respectively. The permittee plans to install V008 in the fourth quarter of 2023 and V011 in the first quarter of 2024.

The two smaller tanks will eventually replace the existing 660,000-gallon tank V003 (Emission Point: DIP-001) which is reaching the end of its service life. However, V003 will remain in operation while the first tank is commissioned.

- iii. A new filling station has been added as emission unit U003. Previously, pails were filled using the drum filling station U001. The permittee plans to install U003 to improve efficiency by automatically filling 5-gallon pails with TMXDI and TMI products. The unit U003 will vent to the existing emission point MEC-003.
 - iv. The reactant trailer loading area V201 has been added to the emission unit table. This loading area will vent to the new emission point UTM-003. V201 will be operated as an alternate loading area along with the current reactant tank wagon V200 (Emission Point: UTM-002).
- b. The Active R13, R14, and R19 Permits table has been updated with R13-2473O which was issued on September 12, 2023.

2. Section 3.0. – Facility-Wide Requirements

- a. A reference to the permit application R13-2473O has been added to Condition 3.1.11. of the operating permit.

3. Section 4.0. – Urethanes Manufacturing Source-Specific Requirements

- a. The new emission points DIP-002, DIP-003, and UTM-003 have been added to the heading of Section 4.0.
- b. The emission points DIP-002 (V008), DIP-003 (V011), UTM-003 (V201), and MEC-003 (U003) are subject to the emission limits set forth in Condition 4.1.1. of the operating permit. Compliance with these limits must be demonstrated according to Conditions 4.1.3. and 4.4.5. of the operating permit.
- c. The storage tanks V008 and V011 each have a capacity of 225,000 gallons (851.7 cubic meters). The reactant that will be stored in the tanks has a true vapor pressure below 3.5 kPa.
 - i. Because the maximum true vapor pressure of the reactant is less than 3.5 kPa, V008 and V011 are not subject to 40 C.F.R. Part 60 Subpart Kb per 40 C.F.R. §60.110b(b).
 - ii. In accordance with Condition 4.1.10. of R13-2473O, the requirement that the maximum true vapor pressure of the material stored in the tanks cannot equal or exceed 3.5 kPa was added to Condition 4.1.10. of the operating permit.

4. Appendix A (Emission Limits)

- a. In accordance with R13-2473O, the following emission limits for units V008, V011, and V201 have been added to the Emission Limits Table of Appendix A in the operating permits.

Emission Point	Source	Pollutant	Emission Limit	
			pph	tpy
DIP-002	V008	VOC	0.1	0.1

Emission Point	Source	Pollutant	Emission Limit	
			pph	tpy
DIP-003	V011	VOC	0.1	0.1
UTM-003	V201	VOC	0.1	0.1

- b. The new pail filling station U003 will vent to the existing emission point MEC-003. Therefore, the source of the emission point MEC-003 has been updated to U001 or U003 in the Emission Limits Table. The VOC emission limit of MEC-003 has not increased due to the addition of U003.

Emission Point	Source	Pollutant	Emission Limit	
			pph	tpy
MEC-003	U001 or U003	VOC	0.1	0.1

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.

Ending Date: Not Applicable.

Point of Contact

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

Sarah Barron
 West Virginia Department of Environmental Protection
 Division of Air Quality
 601 57th Street SE
 Charleston, WV 25304
 304/926-0499 ext. 41915
 sarah.k.barron@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)

None.