

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: **August 12, 2022**
Plant Identification Number: **03-54-073-00003**
Permittee: **Cytec Industries, Inc.**
Facility Name: **Willow Island Plant – Polymer Additives (2 of 3)**
Mailing Address: **#1 Heilman Avenue, Willow Island, WV 26134-9801**

Permit Action Number: *MM03* Revised: *October 14, 2022*

Physical Location: Willow Island, Pleasants County, West Virginia
UTM Coordinates: 474 km Easting • 4,356 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 is not expected to 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	New Source Review – Modification.
	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
R13-2156AK	August 22, 2022

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 I Administrative Update Permit R13-2156AK. This revision adds a new 50 gallon process vessel Mother Liquor Catch Tank (3-15T2) (Emission Unit ID: 13DX) to the Product/Process Area – A1790. Emission Unit 13DX will vent to the existing Emission Point 13HE.

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

1. A row for Emission Unit 13DX has been added under Product/Process Area – A1790 of the Emission Units Table in Section 1.1.
2. The R13 Permit number has been updated to R13-2156AK which was issued on August 22, 2022.
3. The authority of Condition 2.11.4. of the General Conditions has been updated to 45CSR§30-2.40. due to a change in 45CSR30.
4. The authority of Condition 2.22.1. of the General Conditions has been updated to 45CSR§30-5.3.e.3.B. due to the repeal of Rule 45CSR38 by Senate Bill No. 163.
5. The address for the U.S. EPA in Condition 3.5.3. of the Facility-Wide Requirements has been updated.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

N/A

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:

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)

N/A