

To: File
From: John Legg
Date: February 6, 2017



Subject: PD16-070 - "No Decision" Rendered
Covestro, Proctor, Marshall County, WV
Company ID No.: 051-00009
Permit Determination No.: PD016-070

Covestro submitted a permit determination to the DAQ on December 21, 2016. The company is planning to replace the extruder on Line 1 with a larger extruder as Phase 2 of a three Phase Project. The following deficiencies are noted below and caused the writer to not be able to render a "Permit Needed" / "Permit Not Needed" decision:

- Process flow diagram did not show emission points.
- The presences or absence of control equipment/pollutant removal efficiencies was not stated in the determination.
- The percentage increase in final product was not given.
- There was no information given that the increases in PM, VOC and HAP emissions resulting from the project would cause a permit limit to be exceeded.
- In addition to extruder Line 1, there are two additional lines. The determination did not state if the additional lines were to be updated after completing the current project for Line 1.
- The determination mentioned an existing synthetic HAP minor in the permit that was not fully explained.
- PM emissions were said not to increase because the air handling system was to remain the same. The author is not convinced that this statement is correct and would like additional information to support this claim.

A "No Decision" determination letter will be sent to the company asking that further information related to the above-noted deficiencies be addressed in writing ASAP so that a "Permit Needed" / "Permit Not Needed" decision can be rendered by the DAQ.