

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03900001-2014 (3 of 5)**
Application Received: **October 16, 2013**
Plant Identification Number: **03-54-039-00001**
Permittee: **E. I. DuPont de Nemours & Company**
Facility Name: **Belle Plant**
Mailing Address: **901 W. DuPont Ave.**
Belle, WV 25015

Physical Location: Belle, Kanawha County, West Virginia
UTM Coordinates: 451.90 km Easting • 4232.60 km Northing • Zone 17
Directions: US Route 60 exit, then right onto DuPont Avenue, then left at plant gate.

Facility Description

Higher Monomers (HM) and MMA Stripping.

Site - SIC codes: 2869; 2879; 2821

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions (Group 3)	2012 Actual Emissions (Facility Wide)
Carbon Monoxide (CO)	0.0	110.8
Nitrogen Oxides (NO _x)	0.0	330.4
Particulate Matter (PM _{2.5})	0.0	2.8
Particulate Matter (PM ₁₀)	0.0	2.8

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions (Group 3)	2012 Actual Emissions (Facility Wide)
Total Particulate Matter (TSP)	0.0	16.2
Sulfur Dioxide (SO ₂)	0.0	9.5
Volatile Organic Compounds (VOC)	13.2	576.2
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions (Group 3)	2012 Actual Emissions (Facility Wide)
Total HAPs	10.2	52.5

Some of the above HAPs may be counted as PM or VOCs.

This facility has the potential to emit equal to or greater than 100,000 tons per year of carbon dioxide equivalent (CO₂e) and 100 tons per year of greenhouse gases (GHGs) on a mass basis.

Title V Program Applicability Basis

This facility has the potential to emit over 100 tons per year of Carbon Monoxide, Nitrogen Oxides, and Volatile Organic Compounds. The facility also has the potential to emit over 10 tons per year of Methanol and over 25 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, E. I. DuPont de Nemours & Company's Belle Plant 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR16	New Stationary Sources
	45CSR30	Operating permit requirement
	45CSR34	Emission Standards for Hazardous Air Pollutants
	45CSR40	Control of ozone season nitrogen oxides emissions
	40 C.F.R. Part 60 Kb	Tanks

	40 C.F.R. Part 60 NNN	Synthetic Organic Chemical Manufacturing Industry Distillation Operations
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart WW	National Emission Standards for Storage Vessels
	40 C.F.R. Part 63 Subpart FFFF	Miscellaneous Organic NESHAP
	40 C.F.R. Part 65 Subpart C	Storage Vessels
State Only:	45CSR4	No objectionable odors.
	45CSR§21-40	VOC Emissions

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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1002D	2/3/2005	
R13-1628A	7/17/2007	
R13-2742	4/1/2008	
CO-R21-97-31	9/6/1997	
CO-R21-C-2001-10A(97)	04/10/2001	

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 is a renewal of the Title V permit. The following changes have been made to the most recent version of this Permit.

Section 4.0 [MAM/MAA] from the previous permit has been removed. Except for Tank ACR128 which has been rebuilt and moved to Higher Monomers, the rest of the units in this Section have been shut down and dismantled. R13-2641 applied to emission units which were shut down, so all references to it have been removed from this Permit. As a result of the removal of these units, there is no longer a potential to emit (PTE) for Carbon Monoxide (CO), Nitrogen Oxides (NO_x), and Total Particulate Matter (TSP).

Section 5.0 [MMA/Higher Monomers] from the previous permit has been changed to Section 4.0. Tank 210 was designated as ACR041 in the Section 4.0 [MAM/MAA] process in the previous permit. That storage tank has been removed. An existing storage tank (67B2) which was previously an insignificant source now contains ethanol and is now listed as Emission Unit ACR041 in the current Permit. Storage Tank ACR040A was sometimes listed as

ACR40A or ACR040 in the Permit. All citations to this storage tank now identify the tank as ACR040A. Control device ACRC1, which is a control device consisting of an internal floating roof for Storage Tank ACR201 was previously mentioned in the equipment table but not cited in the Permit conditions. These citations have been added to Conditions 4.1.7, 4.2.2-4, 4.4.3, 4.5.3, and 4.5.4. Control device ACRC2, which is a control device consisting of an internal floating roof for Storage Tank ACR040A was added to the equipment table as well as to Conditions 4.1.8, 4.2.6, 4.4.5, 4.4.6, 4.4.7, 4.5.5, 4.5.6, and 4.5.7. Storage Tanks ACR018 and ACR027 have been replaced with identical size tanks. There is no increase of emissions due to the replacement. The new tanks will have the same Emission Unit ID and Emission Point ID as the ones they replaced. Tanks ACR021, ACR024, ACR025, ACR026, ACR028, ACR033, ACR040, ACR043, and ACR209 have been shut down and removed from service. These units have been removed from the emission unit list. ACR209 has also been removed from Conditions 4.1.1 and 4.1.2.

The Rule 10 monitoring plan pertained to Section 4.0 [MAM/MAA] from the previous permit. As this Section has been removed, the Appendix B Rule 10 monitoring plan has been removed from this Permit.

The 45CSR1 NOx budget trading program rule has been repealed. The facility is subject to 45CSR40 CAIR NOx ozone season trading program. Condition 3.1.9 has been revised and Appendix A now has the CAIR Permit Application. The one piece of equipment (Boiler #10) subject to CAIR is permitted in the Group 1 of 5 Title V Permit.

Consent Order CO-R21-97-31 contained an exemption from LDAR certain units as listed in Condition 5.1.6 of the previous permit. However, Consent Order CO-R21-C-2001-10A(97) removed these exemptions as of January 1, 2002. These exemptions have been removed from the permit and the remaining portion has been renumbered as Condition 4.1.6.

Non-Applicability Determinations

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

1. 40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM)

This facility does not have a pollutant specific emissions unit (PSEU) for any pollutant meeting the applicability requirements of 40 C.F.R. §64.2 and therefore does not need to have submitted a CAM plan in accordance with the CAM rule.

This facility is not subject for the following reason:

40CFR§64.2(a)(3) - The facility does not have potential pre-control device emissions equal to or greater than 100 percent of the amount, in tons per year, of any pollutant that would require the facility to be classified as a major source.

2. 40CFR60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels

The storage tank 3A foreshots tank (ACR040A) was modified in 2008. It may have been subject to Subpart Kb as a result of the modification. However, 40CFR§63.2535(c) states that “Alternatively, if a storage tank assigned to an MCPU is subject to control under 40 CFR part 60, subpart Kb, or 40 CFR part 61, subpart Y, you may elect to comply only with the requirements for Group 1 storage tanks in this Subpart FFFF”. This storage tank is complying with the requirements for a Group 1 storage tank under Subpart FFFF.

Storage Tanks ACR018 and ACR027 have been replaced with identical size tanks. They are both under 75 cubic feet, so this Subpart does not apply to the tanks.

3. Greenhouse Gas Tailoring Rule

This is a renewal Title V Permit and there have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

4. 45CSR1 - NO_x Budget Trading Program

This rule has been repealed. The NO_x Budget in Appendix A from the previous Permit has been removed.

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: February 21, 2014

Ending Date: March 24, 2014

Point of Contact

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

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478
michael.egnor@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.