



Moats, Nikki B &lt;nikki.b.moats@wv.gov&gt;

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**Title V Permit status update**

49 messages

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**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>  
Cc: Matthew Harris <matthew.harris@covestro.com>

Tue, Aug 8, 2023 at 12:28 PM

Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP  
E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

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E-mail

[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

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---

**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Tue, Aug 8, 2023 at 2:14 PM

Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,  
Nikki

[Quoted text hidden]

**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Mon, Aug 14, 2023 at 2:38 PM

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

E&amp;S Specialist



Office: 304-746-8046

Cell: 304-410-6416

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**From:** Moats, Nikki B <nikki.b.moats@wv.gov>  
**Sent:** Tuesday, August 8, 2023 2:15 PM  
**To:** Cynthia Lester <cynthia.lester1@covestro.com>  
**Subject:** Re: Title V Permit status update

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[Quoted text hidden]

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**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Mon, Aug 14, 2023 at 2:42 PM

Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done for the day, so that will make sure that it gets to the right place.

[Quoted text hidden]

---

**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Mon, Aug 14, 2023 at 2:44 PM

Will do!

[Quoted text hidden]

---

**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Tue, Aug 15, 2023 at 2:11 PM

Cindi,

I was just wanting to double check and confirm that there is no confidential information in the updates that were provided before we scanned them into our system and added them into the application file.

Thanks,  
Nikki

[Quoted text hidden]

---

**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Tue, Aug 15, 2023 at 2:20 PM

Correct. There is no CBI contained within the updates. Thank you!

Cindi Lester, CSP

E&S Specialist



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[Quoted text hidden]

---

**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Wed, Aug 16, 2023 at 7:28 AM

Cindi,

I need some additional information regarding the permit.

In the SLEIS data and/or in the former permit's fact sheet, there was PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, and Xylene.

Would the PTE numbers from these have changed from the previous permit's fact sheet, and if so, what are the new numbers?

Thanks,  
Nikki  
[Quoted text hidden]

---

**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Wed, Aug 16, 2023 at 8:06 AM

Good morning.

There are no changes to the PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, or Xylene.

[Quoted text hidden]

---

**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Wed, Aug 16, 2023 at 8:44 AM

One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 2561O

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 2561O instead of M.

Thanks,  
Nikki  
[Quoted text hidden]

---


**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Wed, Aug 16, 2023 at 9:50 AM

Per your request. Please let me know if you need anything else.

[Quoted text hidden]

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 **Title V - addtl info\_20230816094852.pdf**  
2990K

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**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Wed, Aug 16, 2023 at 10:25 AM

Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-  
Nikki  
[Quoted text hidden]

---


**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Wed, Aug 16, 2023 at 11:00 AM

No worries. Attached is revised Section 2 of the permit application.

[Quoted text hidden]

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 **TitleV-Section2\_20230816104331.pdf**  
2422K

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**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Carrie McCumbers <carrie.mccumbers@wv.gov>

Wed, Aug 16, 2023 at 11:26 AM

There's a second forward coming as well with the corrected Section 2 of the application.

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 **Title V - addtl info\_20230816094852.pdf**  
2990K

---

**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Carrie McCumbers <carrie.mccumbers@wv.gov>


Wed, Aug 16, 2023 at 11:26 AM

----- Forwarded message -----

From: **Cynthia Lester** <cynthia.lester1@covestro.com>  
Date: Wed, Aug 16, 2023 at 11:01 AM  
Subject: RE: Title V Permit status update  
To: Moats, Nikki B <nikki.b.moats@wv.gov>

[Quoted text hidden]

---

 **TitleV-Section2\_20230816104331.pdf**  
2422K

---

**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Wed, Aug 23, 2023 at 4:44 PM

Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service.

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM.

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit.

My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,  
Nikki

[Quoted text hidden]

---

**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Thu, Aug 24, 2023 at 8:16 AM

Good morning, Nikki.

I wanted to let you know I received your email. I'm going to take this morning to review what is required of me per your email, but I may need some guidance. I will reach out to you sometime today if I need to schedule a call with you. Thank you!

[Quoted text hidden]

---

**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Thu, Aug 24, 2023 at 2:10 PM

Nikki,

See my comments/questions in **red font** in your email below.

Thank you and the DEP staff for ensuring our permit is accurate! We really do appreciate the work you guys are doing to help us.

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service. **The D-2124A control device is still in service. I'm not sure what Attachment A you are referring to, as my Attachment A of the permit application is an Area Map. Please advise.**

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM. **I need to ask for clarification on this point. For all of our control devices, we follow the requirements listed in our permit and submit periodic/annual reports as required.**

- **Since the CAM non-applicability determination no longer being accepted by the EPA mean I need to remove that from our Permit (see the 2<sup>nd</sup> attachment)?**
- **Will this require any additional requirements from us? We monitor these as required and would report if we have a permit exceedance.**
- **If these no longer fall under CAM-non-applicability, do I revise Attachment G (APCD) for each of the control devices and check the "YES" box under the question "Is this device subject to the CAM requirements of 40 CFR 64?" and fill out Attachment H?**


EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit. **I have revised the CFR reference on the APCD form (attached). I believe this is what you are referring to. If not, let me know.**


[Quoted text hidden]

[Quoted text hidden]

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## 2 attachments

 **Attachment G - Ex-2424 and H-2443 Revised.pdf**  
399K

 **20230824140403.pdf**  
461K

**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Fri, Aug 25, 2023 at 9:12 AM

Nikki,

Please find attached the revised APCD forms for C-2016 and Y-2124 based on our phone call yesterday. I believe I have cited the correct reference in 40 CFR 64, but if I'm wrong please let me know.


C-2044 APCD form can be removed as this routes to Y-2124 thermal oxidizer.

D-2124A APCD form can be removed. I did verify that this scrubber was taken out of service several years ago. It was originally for incineration of VDC, but we no longer use VDC.

Please let me know if I've missed anything or if I need to make any more corrections. Thank you!

[Quoted text hidden]

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 **20230825090625.pdf**  
951K

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**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Mon, Aug 28, 2023 at 1:09 PM


Cindi,

It looks like there's one final APCD sheet that needs to be updated. The one for "Ex-2424 and H-2443". It is currently still using the non-applicability determination that the EPA no longer uses outside of CEMS.

Within the permit in condition 3.7.2 (4) regarding CAM non-applicability determination (I've attached a recent draft for convenience), there is a non-applicability determination that was used in the past for these devices. This particular one is still acceptable to the USEPA, but the APCD and the permit non-applicability determination need to match.

[Quoted text hidden]

---

 **DPPermit R30-03900102-2023.docx**  
421K

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**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Mon, Aug 28, 2023 at 1:13 PM

Nikki,

I thought that one last week but here it is. Let me know if the citation is correct. Thanks!

[Quoted text hidden]

---

 **Attachment G - Ex-2424 and H-2443 Revised.pdf**  
399K



**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Mon, Aug 28, 2023 at 1:25 PM

It's not quite correct, it would want to reference something more along the lines of what I put below instead of referencing the continuous compliance determination method. You can word this differently if you'd prefer, this is just what I came up with based on what's currently in the permit.

These devices are considered *inherent process equipment* (as defined in §64.1) which are not included in the regulation's definition of a *control device*; therefore, these devices are not applicable to CAM under §64.2(a)(2).

[Quoted text hidden]

---

**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Mon, Aug 28, 2023 at 1:44 PM

If you don't mind, can I get this corrected and to you first thing in the morning? I had to work from home today. Let me know. If you need it today, I'll get someone from the office to help me. Thanks!

[Quoted text hidden]

---

**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Mon, Aug 28, 2023 at 2:00 PM

Yea, it's fine to get it sent to me tomorrow. I've got some other things I can work on in the meantime.

[Quoted text hidden]

---

**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Mon, Aug 28, 2023 at 2:01 PM

Great!! Thank you! I'll have it over first thing.

Cindi Lester, CSP

E&S Specialist



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Cell: 304-410-6416

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On Mon, Aug 28, 2023 at 1:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

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Cindi Lester, CSP

E&S Specialist



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Nikki

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E&amp;S Specialist



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**Sent:** Wednesday, August 16, 2023 10:25 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

On Wed, Aug 16, 2023 at 9:50 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Per your request. Please let me know if you need anything else.

Cindi Lester, CSP

E&S Specialist



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Covestro LLC

Cell: 304-410-6416

501 Second Ave

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E-mail

West Virginia, 25303

[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 2561O

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 2561O instead of M.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 8:06 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Good morning.

There are no changes to the PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, or Xylene.

Cindi Lester, CSP

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I need some additional information regarding the permit.

In the SLEIS data and/or in the former permit's fact sheet, there was PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, and Xylene.

Would the PTE numbers from these have changed from the previous permit's fact sheet, and if so, what are the new numbers?

Thanks,

Nikki

On Tue, Aug 15, 2023 at 2:20 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:



Correct. There is no CBI contained within the updates. Thank you!

Cindi Lester, CSP

E&S Specialist



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Cindi,

I was just wanting to double check and confirm that there is no confidential information in the updates that were provided before we scanned them into our system and added them into the application file.

Thanks,

Nikki

On Mon, Aug 14, 2023 at 2:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist



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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 14, 2023 2:43 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done for the day, so that will make sure that it gets to the right place.

On Mon, Aug 14, 2023 at 2:38 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

E&S Specialist



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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 8, 2023 2:15 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP

E&S Specialist



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**Cynthia Lester** <cynthia.lester1@covestro.com>

To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Tue, Aug 29, 2023 at 7:45 AM

As promised. Let me know if you need anything else. Thank you!

Cindi Lester, CSP

E&S Specialist



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**From:** Moats, Nikki B <nikki.b.moats@wv.gov>

**Sent:** Monday, August 28, 2023 2:00 PM

**To:** Cynthia Lester <cynthia.lester1@covestro.com>

**Subject:** Re: Title V Permit status update

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Yea, it's fine to get it sent to me tomorrow. I've got some other things I can work on in the meantime.

On Mon, Aug 28, 2023 at 1:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

If you don't mind, can I get this corrected and to you first thing in the morning? I had to work from home today. Let me know. If you need it today, I'll get someone from the office to help me. Thanks!

Cindi Lester, CSP

E&S Specialist



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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:26 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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It's not quite correct, it would want to reference something more along the lines of what I put below instead of referencing the continuous compliance determination method. You can word this differently if you'd prefer, this is just what I came up with based on what's currently in the permit.

These devices are considered *inherent process equipment* (as defined in §64.1) which are not included in the regulation's definition of a *control device*; therefore, these devices are not applicable to CAM under §64.2(a)(2).

On Mon, Aug 28, 2023 at 1:13 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I thought that one last week but here it is. Let me know if the citation is correct. Thanks!

Cindi Lester, CSP

E&S Specialist



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**Sent:** Monday, August 28, 2023 1:10 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
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Cindi,

It looks like there's one final APCD sheet that needs to be updated. The one for "Ex-2424 and H-2443". It is currently still using the non-applicability determination that the EPA no longer uses outside of CEMS.

Within the permit in condition 3.7.2 (4) regarding CAM non-applicability determination (I've attached a recent draft for convenience), there is a non-applicability determination that was used in the past for these devices. This particular one is still acceptable to the USEPA, but the APCD and the permit non-applicability determination need to match.

On Fri, Aug 25, 2023 at 9:12 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

Please find attached the revised APCD forms for C-2016 and Y-2124 based on our phone call yesterday. I believe I have cited the correct reference in 40 CFR 64, but if I'm wrong please let me know.

C-2044 APCD form can be removed as this routes to Y-2124 thermal oxidizer.

D-2124A APCD form can be removed. I did verify that this scrubber was taken out of service several years ago. It was originally for incineration of VDC, but we no longer use VDC.

Please let me know if I've missed anything or if I need to make any more corrections. Thank you!

Cindi Lester, CSP

E&S Specialist



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**Sent:** Wednesday, August 23, 2023 4:44 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service.

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM.

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit.

My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 11:01 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

No worries. Attached is revised Section 2 of the permit application.

Cindi Lester, CSP

E&S Specialist



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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

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Nikki

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Cindi Lester, CSP

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Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done for the day, so that will make sure that it gets to the right place.

On Mon, Aug 14, 2023 at 2:38 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

E&S Specialist



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Cell: 304-410-6416

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

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---

**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 8, 2023 2:15 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP

E&S Specialist



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 **Attachment G - Ex-2424 and H-2443 Revised.pdf**  
447K

**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Mon, Sep 11, 2023 at 11:29 AM

Cindi,

My boss has a few questions in the form of comments on the attached permit draft regarding Subpart PPP monitoring for C-2070 and C-2070B that I was wanting to confirm with you before I added/edited the conditions to the permit in Section 7.0.

This was formerly in the permit incorporated by reference; however, that is not normally how we put conditions in the Title V permits. We're expanding it to properly show all applicable requirements instead.

Thanks,  
Nikki Moats

[Quoted text hidden]

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[Quoted text hidden]

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[Quoted text hidden]

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Nikki,

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Thank you!

[Quoted text hidden]

---

**2 attachments**



image001.jpg  
4K

**DPPermit R30-03900102-2023 Carrie's comments part 4.docx**  
439K

---

**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Tue, Sep 12, 2023 at 8:53 AM

Nikki,

I will need to ask a DOW representative the questions being asked since they own the boilers. I will get you a response as soon as I hear back from them. Thank you!

Cindi Lester, CSP

E&S Specialist



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**Sent:** Monday, September 11, 2023 11:29 AM  
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Cindi,



My boss has a few questions in the form of comments on the attached permit draft regarding Subpart PPP monitoring for C-2070 and C-2070B that I was wanting to confirm with you before I added/edited the conditions to the permit in Section 7.0.

This was formerly in the permit incorporated by reference; however, that is not normally how we put conditions in the Title V permits. We're expanding it to properly show all applicable requirements instead.

Thanks,

Nikki Moats

On Tue, Aug 29, 2023 at 7:45 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

As promised. Let me know if you need anything else. Thank you!

Cindi Lester, CSP

E&S Specialist

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 2:00 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Yea, it's fine to get it sent to me tomorrow. I've got some other things I can work on in the meantime.

On Mon, Aug 28, 2023 at 1:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

If you don't mind, can I get this corrected and to you first thing in the morning? I had to work from home today. Let me know. If you need it today, I'll get someone from the office to help me. Thanks!

Cindi Lester, CSP

E&S Specialist

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:26 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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It's not quite correct, it would want to reference something more along the lines of what I put below instead of referencing the continuous compliance determination method. You can word this differently if you'd prefer, this is just what I came up with based on what's currently in the permit.

These devices are considered *inherent process equipment* (as defined in §64.1) which are not included in the regulation's definition of a *control device*; *therefore*, these devices are not applicable to CAM under §64.2(a)(2).

On Mon, Aug 28, 2023 at 1:13 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I thought that one last week but here it is. Let me know if the citation is correct. Thanks!

Cindi Lester, CSP

E&S Specialist

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:10 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one final APCD sheet that needs to be updated. The one for "Ex-2424 and H-2443". It is currently still using the non-applicability determination that the EPA no longer uses outside of CEMS.

Within the permit in condition 3.7.2 (4) regarding CAM non-applicability determination (I've attached a recent draft for convenience), there is a non-applicability determination that was used in the past for these devices. This particular one is still acceptable to the USEPA, but the APCD and the permit non-applicability determination need to match.

On Fri, Aug 25, 2023 at 9:12 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

Please find attached the revised APCD forms for C-2016 and Y-2124 based on our phone call yesterday. I believe I have cited the correct reference in 40 CFR 64, but if I'm wrong please let me know.

C-2044 APCD form can be removed as this routes to Y-2124 thermal oxidizer.

D-2124A APCD form can be removed. I did verify that this scrubber was taken out of service several years ago. It was originally for incineration of VDC, but we no longer use VDC.

Please let me know if I've missed anything or if I need to make any more corrections. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 23, 2023 4:44 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service.

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using

Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM.

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit.

My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 11:01 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

No worries. Attached is revised Section 2 of the permit application.

Cindi Lester, CSP

E&S Specialist

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Cell: 304-410-6416

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E-mail

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 10:25 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

On Wed, Aug 16, 2023 at 9:50 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Per your request. Please let me know if you need anything else.

Cindi Lester, CSP

E&S Specialist

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 8:45 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
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One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 2561O

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 2561O instead of M.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 8:06 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Good morning.

There are no changes to the PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, or Xylene.

Cindi Lester, CSP

E&S Specialist

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**Sent:** Wednesday, August 16, 2023 7:28 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
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Cindi,

I need some additional information regarding the permit.

In the SLEIS data and/or in the former permit's fact sheet, there was PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, and Xylene.

Would the PTE numbers from these have changed from the previous permit's fact sheet, and if so, what are the new numbers?

Thanks,  
Nikki

On Tue, Aug 15, 2023 at 2:20 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Correct. There is no CBI contained within the updates. Thank you!

Cindi Lester, CSP  
E&S Specialist

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Cindi,

I was just wanting to double check and confirm that there is no confidential information in the updates that were provided before we scanned them into our system and added them into the application file.

Thanks,

Nikki

On Mon, Aug 14, 2023 at 2:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

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Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done for the day, so that will make sure that it gets to the right place.

On Mon, Aug 14, 2023 at 2:38 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

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Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP

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**Cynthia Lester** <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

To: "Moats, Nikki B" <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

Tue, Sep 12, 2023 at 10:58 AM

Nikki,

I have confirmation from DOW that the boilers are both well over 44 megawatts.

The only "bypass" line on Covestro's side would be the vent stack used for nitrogen drying. That is confirmed to be slip blanked before PO Activation/deactivation occurs. It is only pulled for nitrogen drying (clean/fresh) step.

We have monitoring for maximum PO flow to powerhouse to prevent exceeding our permit limits, which we send a report to DOW on a monthly basis.

I believe this answers all of Carrie's questions. Please let me know if you have additional questions or need more information. Thank you!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

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501 Second Ave

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West Virginia, 25303

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---

**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, September 11, 2023 11:29 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

My boss has a few questions in the form of comments on the attached permit draft regarding Subpart PPP monitoring for C-2070 and C-2070B that I was wanting to confirm with you before I added/edited the conditions to the permit in Section 7.0.

This was formerly in the permit incorporated by reference; however, that is not normally how we put conditions in the Title V permits. We're expanding it to properly show all applicable requirements instead.

Thanks,

Nikki Moats

On Tue, Aug 29, 2023 at 7:45 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

As promised. Let me know if you need anything else. Thank you!

Cindi Lester, CSP

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 2:00 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Yea, it's fine to get it sent to me tomorrow. I've got some other things I can work on in the meantime.

On Mon, Aug 28, 2023 at 1:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

If you don't mind, can I get this corrected and to you first thing in the morning? I had to work from home today. Let me know. If you need it today, I'll get someone from the office to help me. Thanks!

Cindi Lester, CSP

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:26 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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It's not quite correct, it would want to reference something more along the lines of what I put below instead of referencing the continuous compliance determination method. You can word this differently if you'd prefer, this is just what I came up with based on what's currently in the permit.

These devices are considered *inherent process equipment* (as defined in §64.1) which are not included in the regulation's definition of a *control device*; therefore, these devices are not applicable to CAM under §64.2(a)(2).

On Mon, Aug 28, 2023 at 1:13 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I thought that one last week but here it is. Let me know if the citation is correct. Thanks!

Cindi Lester, CSP

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:10 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one final APCD sheet that needs to be updated. The one for "Ex-2424 and H-2443". It is currently still using the non-applicability determination that the EPA no longer uses outside of CEMS.

Within the permit in condition 3.7.2 (4) regarding CAM non-applicability determination (I've attached a recent draft for convenience), there is a non-applicability determination that was used in the past for these devices. This particular one is still acceptable to the USEPA, but the APCD and the permit non-applicability determination need to match.

On Fri, Aug 25, 2023 at 9:12 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

Please find attached the revised APCD forms for C-2016 and Y-2124 based on our phone call yesterday. I believe I have cited the correct reference in 40 CFR 64, but if I'm wrong please let me know.

C-2044 APCD form can be removed as this routes to Y-2124 thermal oxidizer.

D-2124A APCD form can be removed. I did verify that this scrubber was taken out of service several years ago. It was originally for incineration of VDC, but we no longer use VDC.

Please let me know if I've missed anything or if I need to make any more corrections. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 23, 2023 4:44 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service.

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM.

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit.



My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 11:01 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

No worries. Attached is revised Section 2 of the permit application.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Wednesday, August 16, 2023 10:25 AM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

**Subject:** Re: Title V Permit status update

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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

On Wed, Aug 16, 2023 at 9:50 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Per your request. Please let me know if you need anything else.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Wednesday, August 16, 2023 8:45 AM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

**Subject:** Re: Title V Permit status update

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One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 2561O

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 2561O instead of M.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 8:06 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Good morning.

There are no changes to the PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, or Xylene.

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 7:28 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I need some additional information regarding the permit.

In the SLEIS data and/or in the former permit's fact sheet, there was PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, and Xylene.

Would the PTE numbers from these have changed from the previous permit's fact sheet, and if so, what are the new numbers?

Thanks,

Nikki

On Tue, Aug 15, 2023 at 2:20 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Correct. There is no CBI contained within the updates. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Tuesday, August 15, 2023 2:12 PM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

**Subject:** Re: Title V Permit status update

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Cindi,

I was just wanting to double check and confirm that there is no confidential information in the updates that were provided before we scanned them into our system and added them into the application file.

Thanks,

Nikki

On Mon, Aug 14, 2023 at 2:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

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Cell: 304-410-6416

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 14, 2023 2:43 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done

for the day, so that will make sure that it gets to the right place.

On Mon, Aug 14, 2023 at 2:38 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 8, 2023 2:15 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP

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**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Wed, Sep 13, 2023 at 9:44 AM

Cindi,

It looks like there's one more question in the comments that she put throughout section 7.0 that I need to confirm.

Is the facility required to have a temperature monitoring device on the firebox? This covers what I might need to add with regards to 40 C.F.R. 63.1429 and 63.1439.

Thanks,  
Nikki Moats

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[Quoted text hidden]

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[Quoted text hidden]

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Tuesday, August 8, 2023 2:15 PM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

**Subject:** Re: Title V Permit status update

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Cindi,



As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

[Quoted text hidden]

---

**Cynthia Lester** <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
To: "Moats, Nikki B" <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

Wed, Sep 13, 2023 at 10:03 AM

I verified with DOW, but no there is not a requirement to have a temperature monitoring device on the fire box.

Cindi Lester, CSP

E&S Specialist



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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, September 13, 2023 9:44 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
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Cindi,

It looks like there's one more question in the comments that she put throughout section 7.0 that I need to confirm.

Is the facility required to have a temperature monitoring device on the firebox? This covers what I might need to add with regards to 40 C.F.R. 63.1429 and 63.1439.

Thanks,

Nikki Moats

On Tue, Sep 12, 2023 at 10:58 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I have confirmation from DOW that the boilers are both well over 44 megawatts.

The only "bypass" line on Covestro's side would be the vent stack used for nitrogen drying. That is confirmed to be slip blanked before PO Activation/deactivation occurs. It is only pulled for nitrogen drying (clean/fresh) step.

We have monitoring for maximum PO flow to powerhouse to prevent exceeding our permit limits, which we send a report to DOW on a monthly basis.

I believe this answers all of Carrie's questions. Please let me know if you have additional questions or need more information. Thank you!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, September 11, 2023 11:29 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

My boss has a few questions in the form of comments on the attached permit draft regarding Subpart PPP monitoring for C-2070 and C-2070B that I was wanting to confirm with you before I added/edited the conditions to the permit in Section 7.0.

This was formerly in the permit incorporated by reference; however, that is not normally how we put conditions in the Title V permits. We're expanding it to properly show all applicable requirements instead.

Thanks,

Nikki Moats

On Tue, Aug 29, 2023 at 7:45 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

As promised. Let me know if you need anything else. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 2:00 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Yea, it's fine to get it sent to me tomorrow. I've got some other things I can work on in the meantime.

On Mon, Aug 28, 2023 at 1:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

If you don't mind, can I get this corrected and to you first thing in the morning? I had to work from home today. Let me know. If you need it today, I'll get someone from the office to help me. Thanks!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:26 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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It's not quite correct, it would want to reference something more along the lines of what I put below instead of referencing the continuous compliance determination method. You can word this differently if you'd prefer, this is just what I came up with based on what's currently in the permit.

These devices are considered *inherent process equipment* (as defined in §64.1) which are not included in the regulation's definition of a *control device*; therefore, these devices are not applicable to CAM under §64.2(a)(2).

On Mon, Aug 28, 2023 at 1:13 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I thought that one last week but here it is. Let me know if the citation is correct. Thanks!

Cindi Lester, CSP  
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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:10 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one final APCD sheet that needs to be updated. The one for "Ex-2424 and H-2443". It is currently still using the non-applicability determination that the EPA no longer uses outside of CEMS.

Within the permit in condition 3.7.2 (4) regarding CAM non-applicability determination (I've attached a recent draft for convenience), there is a non-applicability determination that was used in the past for these devices. This particular one is still acceptable to the USEPA, but the APCD and the permit non-applicability determination need to match.

On Fri, Aug 25, 2023 at 9:12 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

Please find attached the revised APCD forms for C-2016 and Y-2124 based on our phone call yesterday. I believe I have cited the correct reference in 40 CFR 64, but if I'm wrong please let me know.

C-2044 APCD form can be removed as this routes to Y-2124 thermal oxidizer.

D-2124A APCD form can be removed. I did verify that this scrubber was taken out of service several years ago. It was originally for incineration of VDC, but we no longer use VDC.

Please let me know if I've missed anything or if I need to make any more corrections. Thank you!

Cindi Lester, CSP  
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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Wednesday, August 23, 2023 4:44 PM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service.

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM.

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit.

My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 11:01 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

No worries. Attached is revised Section 2 of the permit application.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 10:25 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

On Wed, Aug 16, 2023 at 9:50 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Per your request. Please let me know if you need anything else.



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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 8:45 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 25610

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 25610 instead of M.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 8:06 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

| Good morning.

There are no changes to the PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, or Xylene.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Wednesday, August 16, 2023 7:28 AM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

**Subject:** Re: Title V Permit status update

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Cindi,

I need some additional information regarding the permit.

In the SLEIS data and/or in the former permit's fact sheet, there was PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, and Xylene.

Would the PTE numbers from these have changed from the previous permit's fact sheet, and if so, what are the new numbers?

Thanks,

Nikki

On Tue, Aug 15, 2023 at 2:20 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Correct. There is no CBI contained within the updates. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 15, 2023 2:12 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I was just wanting to double check and confirm that there is no confidential information in the updates that were provided before we scanned them into our system and added them into the application file.

Thanks,

Nikki

On Mon, Aug 14, 2023 at 2:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Will do!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 14, 2023 2:43 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done for the day, so that will make sure that it gets to the right place.

On Mon, Aug 14, 2023 at 2:38 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 8, 2023 2:15 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP

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**Moats, Nikki B** <nikki.b.moats@wv.gov>  
To: Cynthia Lester <cynthia.lester1@covestro.com>

Thu, Sep 21, 2023 at 5:05 PM

Cindi,

Attached you will find the Permit and Fact Sheet for this permit for your review. I've also sent these to Mike Egnor of the DEP so that he can review them as well. I'll keep you updated on any comments he may have after he has reviewed the files.

If you've got any questions or comments, please let me know.

Normally I would give a more exact time-table for these reviews, but I'm not sure how long Mike will need for his. For now, I would like to have any comments back by close of business next Thursday, September 28th.

Thanks,  
Nikki

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Thanks,  
Nikki

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Thank you!

[Quoted text hidden]


4 attachments




image001.jpg  
4K



image001.jpg  
4K

 **DPFactSheet R30-03900102-2023.doc**  
125K

 **DPPermit R30-03900102-2023.docx**  
419K

**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Fri, Sep 22, 2023 at 9:19 AM

Thank you! We will review it and send comments back by next Thursday, September 28<sup>th</sup>.

Cindi Lester, CSP  
E&S Specialist





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**Sent:** Thursday, September 21, 2023 5:06 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
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Attached you will find the Permit and Fact Sheet for this permit for your review. I've also sent these to Mike Egnor of the DEP so that he can review them as well. I'll keep you updated on any comments he may have after he has reviewed the files.

If you've got any questions or comments, please let me know.

Normally I would give a more exact time-table for these reviews, but I'm not sure how long Mike will need for his. For now, I would like to have any comments back by close of business next Thursday, September 28th.

Thanks,

Nikki

On Wed, Sep 13, 2023 at 10:03 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

I verified with DOW, but no there is not a requirement to have a temperature monitoring device on the fire box.

Cindi Lester, CSP

E&S Specialist



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Cell: 304-410-6416

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

Covestro LLC

501 Second Ave

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West Virginia, 25303

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, September 13, 2023 9:44 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one more question in the comments that she put throughout section 7.0 that I need to confirm.

Is the facility required to have a temperature monitoring device on the firebox? This covers what I might need to add with regards to 40 C.F.R. 63.1429 and 63.1439.

Thanks,

Nikki Moats

On Tue, Sep 12, 2023 at 10:58 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I have confirmation from DOW that the boilers are both well over 44 megawatts.

The only "bypass" line on Covestro's side would be the vent stack used for nitrogen drying. That is confirmed to be slip blanked before PO Activation/deactivation occurs. It is only pulled for nitrogen drying (clean/fresh) step.

We have monitoring for maximum PO flow to powerhouse to prevent exceeding our permit limits, which we send a report to DOW on a monthly basis.

I believe this answers all of Carrie's questions. Please let me know if you have additional questions or need more information. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, September 11, 2023 11:29 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

My boss has a few questions in the form of comments on the attached permit draft regarding Subpart PPP monitoring for C-2070 and C-2070B that I was wanting to confirm with you before I added/edited the conditions to the permit in Section 7.0.

This was formerly in the permit incorporated by reference; however, that is not normally how we put conditions in the Title V permits. We're expanding it to properly show all applicable requirements instead.

Thanks,

Nikki Moats

On Tue, Aug 29, 2023 at 7:45 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

As promised. Let me know if you need anything else. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 2:00 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Yea, it's fine to get it sent to me tomorrow. I've got some other things I can work on in the meantime.

On Mon, Aug 28, 2023 at 1:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

If you don't mind, can I get this corrected and to you first thing in the morning? I had to work from home today. Let me know. If you need it today, I'll get someone from the office to help me. Thanks!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:26 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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It's not quite correct, it would want to reference something more along the lines of what I put below instead of referencing the continuous compliance determination method. You can word this differently if you'd prefer, this is just what I came up with based on what's currently in the permit.

These devices are considered *inherent process equipment* (as defined in §64.1) which are not included in the regulation's definition of a *control device*; therefore, these devices are not applicable to CAM under §64.2(a)(2).

On Mon, Aug 28, 2023 at 1:13 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I thought that one last week but here it is. Let me know if the citation is correct. Thanks!

Cindi Lester, CSP  
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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:10 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one final APCD sheet that needs to be updated. The one for "Ex-2424 and H-2443". It is currently still using the non-applicability determination that the EPA no longer uses outside of CEMS.

Within the permit in condition 3.7.2 (4) regarding CAM non-applicability determination (I've attached a recent draft for convenience), there is a non-applicability determination that was used in the past for these devices. This particular one is still acceptable to the USEPA, but the APCD and the permit non-applicability determination need to match.

On Fri, Aug 25, 2023 at 9:12 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

Please find attached the revised APCD forms for C-2016 and Y-2124 based on our phone call yesterday. I believe I have cited the correct reference in 40 CFR 64, but if I'm wrong please let me know.

C-2044 APCD form can be removed as this routes to Y-2124 thermal oxidizer.

D-2124A APCD form can be removed. I did verify that this scrubber was taken out of service several years ago. It was originally for incineration of VDC, but we no longer use VDC.

Please let me know if I've missed anything or if I need to make any more corrections. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 23, 2023 4:44 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service.

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM.

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit.

My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 11:01 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

No worries. Attached is revised Section 2 of the permit application.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 10:25 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

On Wed, Aug 16, 2023 at 9:50 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Per your request. Please let me know if you need anything else.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Wednesday, August 16, 2023 8:45 AM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

**Subject:** Re: Title V Permit status update

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One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 25610

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 2561O instead of M.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 8:06 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Good morning.

There are no changes to the PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, or Xylene.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Wednesday, August 16, 2023 7:28 AM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

**Subject:** Re: Title V Permit status update

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Cindi,

I need some additional information regarding the permit.

In the SLEIS data and/or in the former permit's fact sheet, there was PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, and Xylene.

Would the PTE numbers from these have changed from the previous permit's fact sheet, and if so, what are the new numbers?

Thanks,

Nikki

On Tue, Aug 15, 2023 at 2:20 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Correct. There is no CBI contained within the updates. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 15, 2023 2:12 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I was just wanting to double check and confirm that there is no confidential information in the updates that were provided before we scanned them into our system and added them into the application file.

Thanks,

Nikki

On Mon, Aug 14, 2023 at 2:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 14, 2023 2:43 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done for the day, so that will make sure that it gets to the right place.

On Mon, Aug 14, 2023 at 2:38 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 8, 2023 2:15 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP

E&S Specialist

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**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Fri, Sep 22, 2023 at 10:21 AM

Nikki – would you be able to send me our revised Title V permit with red-lines (changes that are being made)? It would make it a lot easier for me to review. Thank you!

Cindi Lester, CSP

E&S Specialist



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Cell: 304-410-6416

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Thursday, September 21, 2023 5:06 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Attached you will find the Permit and Fact Sheet for this permit for your review. I've also sent these to Mike Egnor of the DEP so that he can review them as well. I'll keep you updated on any comments he may have after he has reviewed the files.

If you've got any questions or comments, please let me know.

Normally I would give a more exact time-table for these reviews, but I'm not sure how long Mike will need for his. For now, I would like to have any comments back by close of business next Thursday, September 28th.

Thanks,

Nikki

On Wed, Sep 13, 2023 at 10:03 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

I verified with DOW, but no there is not a requirement to have a temperature monitoring device on the fire box.

Cindi Lester, CSP

E&S Specialist



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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, September 13, 2023 9:44 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one more question in the comments that she put throughout section 7.0 that I need to confirm.

Is the facility required to have a temperature monitoring device on the firebox? This covers what I might need to add with regards to 40 C.F.R. 63.1429 and 63.1439.

Thanks,

Nikki Moats

On Tue, Sep 12, 2023 at 10:58 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I have confirmation from DOW that the boilers are both well over 44 megawatts.

The only "bypass" line on Covestro's side would be the vent stack used for nitrogen drying. That is confirmed to be slip blanked before PO Activation/deactivation occurs. It is only pulled for nitrogen drying (clean/fresh) step.

We have monitoring for maximum PO flow to powerhouse to prevent exceeding our permit limits, which we send a report to DOW on a monthly basis.

I believe this answers all of Carrie's questions. Please let me know if you have additional questions or need more information. Thank you!

Cindi Lester, CSP

E&S Specialist



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West Virginia, 25303

[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, September 11, 2023 11:29 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

My boss has a few questions in the form of comments on the attached permit draft regarding Subpart PPP monitoring for C-2070 and C-2070B that I was wanting to confirm with you before I added/edited the conditions to the permit in Section 7.0.

This was formerly in the permit incorporated by reference; however, that is not normally how we put conditions in the Title V permits. We're expanding it to properly show all applicable requirements instead.

Thanks,

Nikki Moats

On Tue, Aug 29, 2023 at 7:45 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

As promised. Let me know if you need anything else. Thank you!

Cindi Lester, CSP

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 2:00 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Yea, it's fine to get it sent to me tomorrow. I've got some other things I can work on in the meantime.

On Mon, Aug 28, 2023 at 1:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

If you don't mind, can I get this corrected and to you first thing in the morning? I had to work from home today. Let me know. If you need it today, I'll get someone from the office to help me. Thanks!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:26 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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It's not quite correct, it would want to reference something more along the lines of what I put below instead of referencing the continuous compliance determination method. You can word this differently if you'd prefer, this is just what I came up with based on what's currently in the permit.

These devices are considered *inherent process equipment* (as defined in §64.1) which are not included in the regulation's definition of a *control device*; *therefore*, these devices are not applicable to CAM under §64.2(a)(2).

On Mon, Aug 28, 2023 at 1:13 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I thought that one last week but here it is. Let me know if the citation is correct. Thanks!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:10 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one final APCD sheet that needs to be updated. The one for "Ex-2424 and H-2443". It is currently still using the non-applicability determination that the EPA no longer uses outside of CEMS.

Within the permit in condition 3.7.2 (4) regarding CAM non-applicability determination (I've attached a recent draft for convenience), there is a non-applicability determination that was used in the past for these devices. This particular one is still acceptable to the USEPA, but the APCD and the permit non-applicability determination need to match.

On Fri, Aug 25, 2023 at 9:12 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

Please find attached the revised APCD forms for C-2016 and Y-2124 based on our phone call yesterday. I believe I have cited the correct reference in 40 CFR 64, but if I'm wrong please let me know.

C-2044 APCD form can be removed as this routes to Y-2124 thermal oxidizer.

D-2124A APCD form can be removed. I did verify that this scrubber was taken out of service several years ago. It was originally for incineration of VDC, but we no longer use VDC.

Please let me know if I've missed anything or if I need to make any more corrections. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 23, 2023 4:44 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service.

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM.

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit.

My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 11:01 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

No worries. Attached is revised Section 2 of the permit application.

Cindi Lester, CSP

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 10:25 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

On Wed, Aug 16, 2023 at 9:50 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Per your request. Please let me know if you need anything else.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Wednesday, August 16, 2023 8:45 AM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

**Subject:** Re: Title V Permit status update

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One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 25610

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 25610 instead of M.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 8:06 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Good morning.

There are no changes to the PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, or Xylene.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 7:28 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I need some additional information regarding the permit.

In the SLEIS data and/or in the former permit's fact sheet, there was PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, and Xylene.

Would the PTE numbers from these have changed from the previous permit's fact sheet, and if so, what are the new numbers?

Thanks,

Nikki



On Tue, Aug 15, 2023 at 2:20 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Correct. There is no CBI contained within the updates. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 15, 2023 2:12 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I was just wanting to double check and confirm that there is no confidential information in the updates that were provided before we scanned them into our system and added them into the application file.

Thanks,

Nikki

On Mon, Aug 14, 2023 at 2:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Will do!

Cindi Lester, CSP

E&amp;S Specialist

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 14, 2023 2:43 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done for the day, so that will make sure that it gets to the right place.

On Mon, Aug 14, 2023 at 2:38 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

E&S Specialist

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 8, 2023 2:15 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP

E&S Specialist

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**Moats, Nikki B** <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
To: Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

Mon, Sep 25, 2023 at 7:07 AM

Cindi,

The closest thing I have is a comparison of the new document versus the old using the tool in Microsoft Word. All of the noteworthy changes that aren't simply fixing capitalization or typos is mentioned in the Fact Sheet, but this should mark every change that has been made throughout the document.

On Fri, Sep 22, 2023 at 10:22 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki – would you be able to send me our revised Title V permit with red-lines (changes that are being made)? It would make it a lot easier for me to review. Thank you!

Cindi Lester, CSP  
E&S Specialist



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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Thursday, September 21, 2023 5:06 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Attached you will find the Permit and Fact Sheet for this permit for your review. I've also sent these to Mike Egnor of the DEP so that he can review them as well. I'll keep you updated on any comments he may have after he has reviewed the files.

If you've got any questions or comments, please let me know.

Normally I would give a more exact time-table for these reviews, but I'm not sure how long Mike will need for his. For now, I would like to have any comments back by close of business next Thursday, September 28th.

Thanks,

Nikki

On Wed, Sep 13, 2023 at 10:03 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

I verified with DOW, but no there is not a requirement to have a temperature monitoring device on the fire box.

Cindi Lester, CSP

E&S Specialist



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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, September 13, 2023 9:44 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one more question in the comments that she put throughout section 7.0 that I need to confirm.

Is the facility required to have a temperature monitoring device on the firebox? This covers what I might need to add with regards to 40 C.F.R. 63.1429 and 63.1439.

Thanks,

Nikki Moats

On Tue, Sep 12, 2023 at 10:58 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I have confirmation from DOW that the boilers are both well over 44 megawatts.

The only "bypass" line on Covestro's side would be the vent stack used for nitrogen drying. That is confirmed to be slip blanked before PO Activation/deactivation occurs. It is only pulled for nitrogen drying (clean/fresh) step.

We have monitoring for maximum PO flow to powerhouse to prevent exceeding our permit limits, which we send a report to DOW on a monthly basis.

I believe this answers all of Carrie's questions. Please let me know if you have additional questions or need more information. Thank you!

Cindi Lester, CSP

E&S Specialist

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, September 11, 2023 11:29 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

My boss has a few questions in the form of comments on the attached permit draft regarding Subpart PPP monitoring for C-2070 and C-2070B that I was wanting to confirm with you before I added/edited the conditions to the permit in Section 7.0.

This was formerly in the permit incorporated by reference; however, that is not normally how we put conditions in the Title V permits. We're expanding it to properly show all applicable requirements instead.

Thanks,

Nikki Moats

On Tue, Aug 29, 2023 at 7:45 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

As promised. Let me know if you need anything else. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 2:00 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Yea, it's fine to get it sent to me tomorrow. I've got some other things I can work on in the meantime.

On Mon, Aug 28, 2023 at 1:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

If you don't mind, can I get this corrected and to you first thing in the morning? I had to work from home today. Let me know. If you need it today, I'll get someone from the office to help me. Thanks!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:26 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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It's not quite correct, it would want to reference something more along the lines of what I put below instead of referencing the continuous compliance determination method. You can word this differently if you'd prefer, this is just what I came up with based on what's currently in the permit.



These devices are considered *inherent process equipment* (as defined in §64.1) which are not included in the regulation's definition of a *control device*; therefore, these devices are not applicable to CAM under §64.2(a)(2).

On Mon, Aug 28, 2023 at 1:13 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I thought that one last week but here it is. Let me know if the citation is correct. Thanks!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Monday, August 28, 2023 1:10 PM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one final APCD sheet that needs to be updated. The one for "Ex-2424 and H-2443". It is currently still using the non-applicability determination that the EPA no longer uses outside of CEMS.

Within the permit in condition 3.7.2 (4) regarding CAM non-applicability determination (I've attached a recent draft for convenience), there is a non-applicability determination that was used in the past for these devices. This particular one is still acceptable to the USEPA, but the APCD and the permit non-applicability determination need to match.

On Fri, Aug 25, 2023 at 9:12 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

Please find attached the revised APCD forms for C-2016 and Y-2124 based on our phone call yesterday. I believe I have cited the correct reference in 40 CFR 64, but if I'm wrong please let me know.

C-2044 APCD form can be removed as this routes to Y-2124 thermal oxidizer.

D-2124A APCD form can be removed. I did verify that this scrubber was taken out of service several years ago. It was originally for incineration of VDC, but we no longer use VDC.

Please let me know if I've missed anything or if I need to make any more corrections. Thank you!

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 23, 2023 4:44 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service.

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM.

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit.

My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 11:01 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

No worries. Attached is revised Section 2 of the permit application.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 10:25 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

On Wed, Aug 16, 2023 at 9:50 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Per your request. Please let me know if you need anything else.

Cindi Lester, CSP

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 8:45 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 2561O

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 2561O instead of M.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 8:06 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Good morning.

There are no changes to the PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, or Xylene.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 7:28 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I need some additional information regarding the permit.

In the SLEIS data and/or in the former permit's fact sheet, there was PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, and Xylene.

Would the PTE numbers from these have changed from the previous permit's fact sheet, and if so, what are the new numbers?

Thanks,

Nikki

On Tue, Aug 15, 2023 at 2:20 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Correct. There is no CBI contained within the updates. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 15, 2023 2:12 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I was just wanting to double check and confirm that there is no confidential information in the updates that were provided before we scanned them into our system and added them into the application file.

Thanks,

Nikki

On Mon, Aug 14, 2023 at 2:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Will do!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 14, 2023 2:43 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done for the day, so that will make sure that it gets to the right place.

On Mon, Aug 14, 2023 at 2:38 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 8, 2023 2:15 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

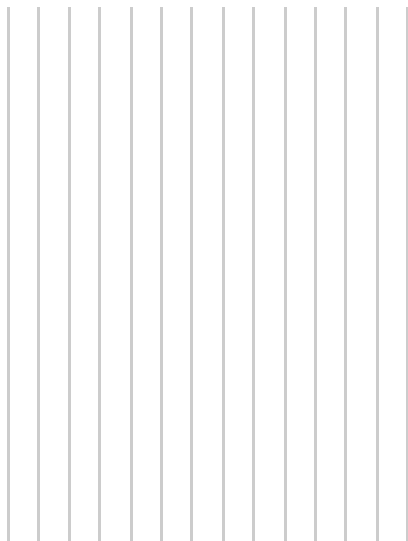
Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP

E&S Specialist



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**3 attachments**



image001.jpg  
4K



image001.jpg  
4K



**Title V Compare Document.docx**  
460K

**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Mon, Sep 25, 2023 at 8:24 AM

Thank you!

Cindi Lester, CSP  
E&S Specialist



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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, September 25, 2023 7:08 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

The closest thing I have is a comparison of the new document versus the old using the tool in Microsoft Word. All of the noteworthy changes that aren't simply fixing capitalization or typos is mentioned in the Fact Sheet, but this should mark every change that has been made throughout the document.

On Fri, Sep 22, 2023 at 10:22 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki – would you be able to send me our revised Title V permit with red-lines (changes that are being made)? It would make it a lot easier for me to review. Thank you!

Cindi Lester, CSP  
E&S Specialist



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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Thursday, September 21, 2023 5:06 PM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Attached you will find the Permit and Fact Sheet for this permit for your review. I've also sent these to Mike Egnor of the DEP so that he can review them as well. I'll keep you updated on any comments he may have after he has reviewed the files.

If you've got any questions or comments, please let me know.

Normally I would give a more exact time-table for these reviews, but I'm not sure how long Mike will need for his. For now, I would like to have any comments back by close of business next Thursday, September 28th.

Thanks,

Nikki

On Wed, Sep 13, 2023 at 10:03 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

I verified with DOW, but no there is not a requirement to have a temperature monitoring device on the fire box.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, September 13, 2023 9:44 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one more question in the comments that she put throughout section 7.0 that I need to confirm.

Is the facility required to have a temperature monitoring device on the firebox? This covers what I might need to add with regards to 40 C.F.R. 63.1429 and 63.1439.

Thanks,

Nikki Moats

On Tue, Sep 12, 2023 at 10:58 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I have confirmation from DOW that the boilers are both well over 44 megawatts.

The only "bypass" line on Covestro's side would be the vent stack used for nitrogen drying. That is confirmed to be slip blanked before PO Activation/deactivation occurs. It is only pulled for nitrogen drying (clean/fresh) step.

We have monitoring for maximum PO flow to powerhouse to prevent exceeding our permit limits, which we send a report to DOW on a monthly basis.

I believe this answers all of Carrie's questions. Please let me know if you have additional questions or need more information. Thank you!

Cindi Lester, CSP

E&S Specialist

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, September 11, 2023 11:29 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

My boss has a few questions in the form of comments on the attached permit draft regarding Subpart PPP monitoring for C-2070 and C-2070B that I was wanting to confirm with you before I added/edited the conditions to the permit in Section 7.0.

This was formerly in the permit incorporated by reference; however, that is not normally how we put conditions in the Title V permits. We're expanding it to properly show all applicable requirements instead.

Thanks,

Nikki Moats

On Tue, Aug 29, 2023 at 7:45 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

As promised. Let me know if you need anything else. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 2:00 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Yea, it's fine to get it sent to me tomorrow. I've got some other things I can work on in the meantime.

On Mon, Aug 28, 2023 at 1:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

If you don't mind, can I get this corrected and to you first thing in the morning? I had to work from home today. Let me know. If you need it today, I'll get someone from the office to help me. Thanks!

Cindi Lester, CSP

E&S Specialist

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:26 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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It's not quite correct, it would want to reference something more along the lines of what I put below instead of referencing the continuous compliance determination method. You can word this differently if you'd prefer, this is just what I came up with based on what's currently in the permit.

These devices are considered *inherent process equipment* (as defined in §64.1) which are not included in the regulation's definition of a *control device*; *therefore*, these devices are not applicable to CAM under §64.2(a)(2).

On Mon, Aug 28, 2023 at 1:13 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I thought that one last week but here it is. Let me know if the citation is correct. Thanks!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:10 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one final APCD sheet that needs to be updated. The one for "Ex-2424 and H-2443". It is currently still using the non-applicability determination that the EPA no longer uses outside of CEMS.



Within the permit in condition 3.7.2 (4) regarding CAM non-applicability determination (I've attached a recent draft for convenience), there is a non-applicability determination that was used in the past for these devices. This particular one is still acceptable to the USEPA, but the APCD and the permit non-applicability determination need to match.

On Fri, Aug 25, 2023 at 9:12 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

Please find attached the revised APCD forms for C-2016 and Y-2124 based on our phone call yesterday. I believe I have cited the correct reference in 40 CFR 64, but if I'm wrong please let me know.

C-2044 APCD form can be removed as this routes to Y-2124 thermal oxidizer.

D-2124A APCD form can be removed. I did verify that this scrubber was taken out of service several years ago. It was originally for incineration of VDC, but we no longer use VDC.

Please let me know if I've missed anything or if I need to make any more corrections. Thank you!

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 23, 2023 4:44 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service.

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM.

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit.

My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 11:01 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

No worries. Attached is revised Section 2 of the permit application.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Wednesday, August 16, 2023 10:25 AM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

**Subject:** Re: Title V Permit status update

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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

On Wed, Aug 16, 2023 at 9:50 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Per your request. Please let me know if you need anything else.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 8:45 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 2561O

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 2561O instead of M.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 8:06 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Good morning.

There are no changes to the PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, or Xylene.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 7:28 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I need some additional information regarding the permit.

In the SLEIS data and/or in the former permit's fact sheet, there was PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, and Xylene.

Would the PTE numbers from these have changed from the previous permit's fact sheet, and if so, what are the new numbers?

Thanks,

Nikki

On Tue, Aug 15, 2023 at 2:20 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Correct. There is no CBI contained within the updates. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 15, 2023 2:12 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I was just wanting to double check and confirm that there is no confidential information in the updates that were provided before we scanned them into our system and added them into the application file.

Thanks,

Nikki

On Mon, Aug 14, 2023 at 2:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Will do!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 14, 2023 2:43 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done for the day, so that will make sure that it gets to the right place.

On Mon, Aug 14, 2023 at 2:38 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 8, 2023 2:15 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

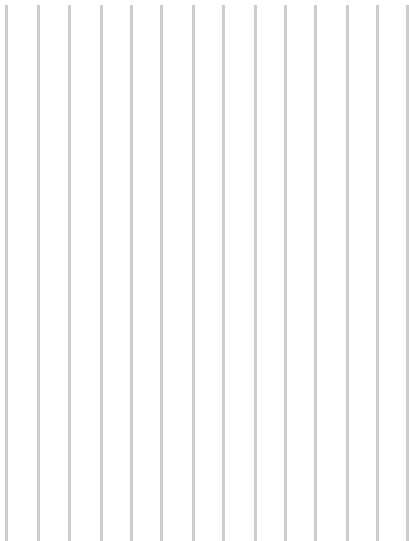
I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP

E&S Specialist





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**Cynthia Lester** <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Mon, Sep 25, 2023 at 10:33 AM

Thank you, Nikki. I will have comments back by Wednesday end of business day.

Cindi Lester, CSP  
E&S Specialist



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**From:** Moats, Nikki B <nikki.b.moats@wv.gov>  
**Sent:** Monday, September 25, 2023 7:08 AM  
**To:** Cynthia Lester <cynthia.lester1@covestro.com>  
**Subject:** Re: Title V Permit status update

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Cindi,

The closest thing I have is a comparison of the new document versus the old using the tool in Microsoft Word. All of the noteworthy changes that aren't simply fixing capitalization or typos is mentioned in the Fact Sheet, but this should mark every change that has been made throughout the document.

On Fri, Sep 22, 2023 at 10:22 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki – would you be able to send me our revised Title V permit with red-lines (changes that are being made)? It would make it a lot easier for me to review. Thank you!

Cindi Lester, CSP

E&S Specialist



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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Thursday, September 21, 2023 5:06 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Attached you will find the Permit and Fact Sheet for this permit for your review. I've also sent these to Mike Egnor of the DEP so that he can review them as well. I'll keep you updated on any comments he may have after he has reviewed the files.

If you've got any questions or comments, please let me know.

Normally I would give a more exact time-table for these reviews, but I'm not sure how long Mike will need for his. For now, I would like to have any comments back by close of business next Thursday, September 28th.

Thanks,

Nikki

On Wed, Sep 13, 2023 at 10:03 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

I verified with DOW, but no there is not a requirement to have a temperature monitoring device on the fire box.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, September 13, 2023 9:44 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one more question in the comments that she put throughout section 7.0 that I need to confirm.

Is the facility required to have a temperature monitoring device on the firebox? This covers what I might need to add with regards to 40 C.F.R. 63.1429 and 63.1439.

Thanks,

Nikki Moats

On Tue, Sep 12, 2023 at 10:58 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I have confirmation from DOW that the boilers are both well over 44 megawatts.

The only "bypass" line on Covestro's side would be the vent stack used for nitrogen drying. That is confirmed to be slip blanked before PO Activation/deactivation occurs. It is only pulled for nitrogen drying (clean/fresh) step.

We have monitoring for maximum PO flow to powerhouse to prevent exceeding our permit limits, which we send a report to DOW on a monthly basis.

I believe this answers all of Carrie's questions. Please let me know if you have additional questions or need more information. Thank you!

Cindi Lester, CSP

E&S Specialist

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Cell: 304-410-6416

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

Covestro LLC

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, September 11, 2023 11:29 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

My boss has a few questions in the form of comments on the attached permit draft regarding Subpart PPP monitoring for C-2070 and C-2070B that I was wanting to confirm with you before I added/edited the conditions to the permit in Section 7.0.

This was formerly in the permit incorporated by reference; however, that is not normally how we put conditions in the Title V permits. We're expanding it to properly show all applicable requirements instead.

Thanks,

Nikki Moats

On Tue, Aug 29, 2023 at 7:45 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

As promised. Let me know if you need anything else. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Monday, August 28, 2023 2:00 PM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

**Subject:** Re: Title V Permit status update

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Yea, it's fine to get it sent to me tomorrow. I've got some other things I can work on in the meantime.

On Mon, Aug 28, 2023 at 1:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

If you don't mind, can I get this corrected and to you first thing in the morning? I had to work from home today. Let me know. If you need it today, I'll get someone from the office to help me. Thanks!

Cindi Lester, CSP

E&S Specialist

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:26 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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It's not quite correct, it would want to reference something more along the lines of what I put below instead of referencing the continuous compliance determination method. You can word this differently if you'd prefer, this is just what I came up with based on what's currently in the permit.

These devices are considered *inherent process equipment* (as defined in §64.1) which are not included in the regulation's definition of a *control device*; therefore, these devices are not applicable to CAM under §64.2(a)(2).

On Mon, Aug 28, 2023 at 1:13 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I thought that one last week but here it is. Let me know if the citation is correct. Thanks!

Cindi Lester, CSP  
E&S Specialist

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:10 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one final APCD sheet that needs to be updated. The one for "Ex-2424 and H-2443". It is currently still using the non-applicability determination that the EPA no longer uses outside of CEMS.

Within the permit in condition 3.7.2 (4) regarding CAM non-applicability determination (I've attached a recent draft for convenience), there is a non-applicability determination that was used in the past for these devices. This particular one is still acceptable to the USEPA, but the APCD and the permit non-applicability determination need to match.

On Fri, Aug 25, 2023 at 9:12 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

Please find attached the revised APCD forms for C-2016 and Y-2124 based on our phone call yesterday. I believe I have cited the correct reference in 40 CFR 64, but if I'm wrong please let me know.

C-2044 APCD form can be removed as this routes to Y-2124 thermal oxidizer.

D-2124A APCD form can be removed. I did verify that this scrubber was taken out of service several years ago. It was originally for incineration of VDC, but we no longer use VDC.

Please let me know if I've missed anything or if I need to make any more corrections. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 23, 2023 4:44 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service.

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.



All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM.

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit.

My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 11:01 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

No worries. Attached is revised Section 2 of the permit application.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 10:25 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

On Wed, Aug 16, 2023 at 9:50 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Per your request. Please let me know if you need anything else.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 8:45 AM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 2561O

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 2561O instead of M.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 8:06 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Good morning.

There are no changes to the PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, or Xylene.

Cindi Lester, CSP  
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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 7:28 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I need some additional information regarding the permit.

In the SLEIS data and/or in the former permit's fact sheet, there was PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, and Xylene.

Would the PTE numbers from these have changed from the previous permit's fact sheet, and if so, what are the new numbers?

Thanks,

Nikki

On Tue, Aug 15, 2023 at 2:20 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Correct. There is no CBI contained within the updates. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 15, 2023 2:12 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I was just wanting to double check and confirm that there is no confidential information in the updates that were provided before we scanned them into our system and added them into the application file.

Thanks,

Nikki

On Mon, Aug 14, 2023 at 2:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 14, 2023 2:43 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done for the day, so that will make sure that it gets to the right place.

On Mon, Aug 14, 2023 at 2:38 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 8, 2023 2:15 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP

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**Moats, Nikki B** <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
To: Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

Mon, Sep 25, 2023 at 2:42 PM

Cindi,

It also looks like we're going to have to ask Covestro to submit a Class I NSR permit update regarding re-adding of Appendix A to 2561O. It looks like when the files were transferred from the old owners to your facility that it was neglected to be added in permit 2561L.

There is a version of this in appendix A of the Title V permit that you can start from to ensure that it is correct. My supervisor also had the following comments after we've looked through everything today and spoken with Mike Egnor and the NSR Permitting Supervisor.

"Please ask Covestro to submit a Class I update to include Attachment A in their NSR permit. The company should also update the Attachment A with the current NSR permit numbers and should remove C-7000 from the table. I looked at the 45CSR21/27 Attachment for Chemours and instead of a column for "Original 45CSR13 Permit", their column has "Affected R13 Permit" with a note that the Affected R13 Permit refers to the most current version of that Permit. By changing Covestro's column to "Affected R13 Permit" this might eliminate the confusion of referencing NSR permits that have been superseded."

If you've got any questions, feel free to reach out to me for a phone call, as I have spent quite a long time today looking through these things.

Sincerely,  
Nikki B. Moats  
Title V Permit Writer  
304-926-0499 ext 41282 or 304-414-1282

On Mon, Sep 25, 2023 at 10:33 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Thank you, Nikki. I will have comments back by Wednesday end of business day.

Cindi Lester, CSP  
E&S Specialist



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Cell: 304-410-6416

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, September 25, 2023 7:08 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

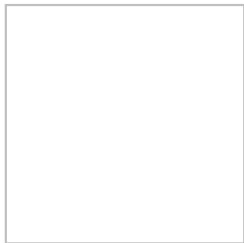
The closest thing I have is a comparison of the new document versus the old using the tool in Microsoft Word. All of the noteworthy changes that aren't simply fixing capitalization or typos is mentioned in the Fact Sheet, but this should mark every change that has been made throughout the document.

On Fri, Sep 22, 2023 at 10:22 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki – would you be able to send me our revised Title V permit with red-lines (changes that are being made)? It would make it a lot easier for me to review. Thank you!

Cindi Lester, CSP

E&S Specialist



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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Thursday, September 21, 2023 5:06 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Attached you will find the Permit and Fact Sheet for this permit for your review. I've also sent these to Mike Egnor of the DEP so that he can review them as well. I'll keep you updated on any comments he may have after he has reviewed the files.

If you've got any questions or comments, please let me know.

Normally I would give a more exact time-table for these reviews, but I'm not sure how long Mike will need for his. For now, I would like to have any comments back by close of business next Thursday, September 28th.

Thanks,

Nikki

On Wed, Sep 13, 2023 at 10:03 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

I verified with DOW, but no there is not a requirement to have a temperature monitoring device on the fire box.

Cindi Lester, CSP

E&S Specialist

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Cell: 304-410-6416

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, September 13, 2023 9:44 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one more question in the comments that she put throughout section 7.0 that I need to confirm.

Is the facility required to have a temperature monitoring device on the firebox? This covers what I might need to add with regards to 40 C.F.R. 63.1429 and 63.1439.

Thanks,

Nikki Moats

On Tue, Sep 12, 2023 at 10:58 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I have confirmation from DOW that the boilers are both well over 44 megawatts.

The only "bypass" line on Covestro's side would be the vent stack used for nitrogen drying. That is confirmed to be slip blanked before PO Activation/deactivation occurs. It is only pulled for nitrogen drying (clean/fresh) step.

We have monitoring for maximum PO flow to powerhouse to prevent exceeding our permit limits, which we send a report to DOW on a monthly basis.

I believe this answers all of Carrie's questions. Please let me know if you have additional questions or need more information. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>

**Sent:** Monday, September 11, 2023 11:29 AM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>

**Subject:** Re: Title V Permit status update

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Cindi,

My boss has a few questions in the form of comments on the attached permit draft regarding Subpart PPP monitoring for C-2070 and C-2070B that I was wanting to confirm with you before I added/edited the conditions to the permit in Section 7.0.

This was formerly in the permit incorporated by reference; however, that is not normally how we put conditions in the Title V permits. We're expanding it to properly show all applicable requirements instead.

Thanks,

Nikki Moats

On Tue, Aug 29, 2023 at 7:45 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

As promised. Let me know if you need anything else. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 2:00 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Yea, it's fine to get it sent to me tomorrow. I've got some other things I can work on in the meantime.

On Mon, Aug 28, 2023 at 1:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

If you don't mind, can I get this corrected and to you first thing in the morning? I had to work from home today. Let me know. If you need it today, I'll get someone from the office to help me. Thanks!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:26 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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It's not quite correct, it would want to reference something more along the lines of what I put below instead of referencing the continuous compliance determination method. You can word this differently if you'd prefer, this is just what I came up with based on what's currently in the permit.

These devices are considered *inherent process equipment* (as defined in §64.1) which are not included in the regulation's definition of a *control device*; therefore, these devices are not applicable to CAM under §64.2(a)(2).

On Mon, Aug 28, 2023 at 1:13 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I thought that one last week but here it is. Let me know if the citation is correct. Thanks!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:10 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one final APCD sheet that needs to be updated. The one for "Ex-2424 and H-2443". It is currently still using the non-applicability determination that the EPA no longer uses outside of CEMS.

Within the permit in condition 3.7.2 (4) regarding CAM non-applicability determination (I've attached a recent draft for convenience), there is a non-applicability determination that was used in the past for these devices. This particular one is still acceptable to the USEPA, but the APCD and the permit non-applicability determination need to match.

On Fri, Aug 25, 2023 at 9:12 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

Please find attached the revised APCD forms for C-2016 and Y-2124 based on our phone call yesterday. I believe I have cited the correct reference in 40 CFR 64, but if I'm wrong please let me know.

C-2044 APCD form can be removed as this routes to Y-2124 thermal oxidizer.

D-2124A APCD form can be removed. I did verify that this scrubber was taken out of service several years ago. It was originally for incineration of VDC, but we no longer use VDC.

Please let me know if I've missed anything or if I need to make any more corrections. Thank you!

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 23, 2023 4:44 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service.

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM.

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit.

My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 11:01 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

No worries. Attached is revised Section 2 of the permit application.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 10:25 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

On Wed, Aug 16, 2023 at 9:50 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Per your request. Please let me know if you need anything else.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 8:45 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 2561O

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 2561O instead of M.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 8:06 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Good morning.

There are no changes to the PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, or Xylene.

Cindi Lester, CSP

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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 7:28 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I need some additional information regarding the permit.

In the SLEIS data and/or in the former permit's fact sheet, there was PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, and Xylene.

Would the PTE numbers from these have changed from the previous permit's fact sheet, and if so, what are the new numbers?

Thanks,

Nikki

On Tue, Aug 15, 2023 at 2:20 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Correct. There is no CBI contained within the updates. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 15, 2023 2:12 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I was just wanting to double check and confirm that there is no confidential information in the updates that were provided before we scanned them into our system and added them into the application file.

Thanks,

Nikki

On Mon, Aug 14, 2023 at 2:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Will do!

Cindi Lester, CSP  
E&S Specialist

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 14, 2023 2:43 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done for the day, so that will make sure that it gets to the right place.

On Mon, Aug 14, 2023 at 2:38 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Tuesday, August 8, 2023 2:15 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP

E&S Specialist

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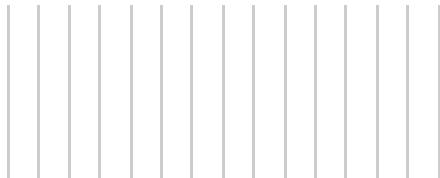
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2 attachments



image001.jpg  
4K



image001.jpg  
4K

Cynthia Lester <cynthia.lester1@covestro.com>  
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Mon, Sep 25, 2023 at 3:43 PM

Nikki,

Do you have a drop-dead date you need this by? I will do my best to get this to you by the end of this week, unless you need it sooner. Please advise. Thank you!

Cindi Lester, CSP  
E&S Specialist



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Cell: 304-410-6416

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, September 25, 2023 2:42 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It also looks like we're going to have to ask Covestro to submit a Class I NSR permit update regarding re-adding of Appendix A to 2561O. It looks like when the files were transferred from the old owners to your facility that it was neglected to be added in permit 2561L.

There is a version of this in appendix A of the Title V permit that you can start from to ensure that it is correct. My supervisor also had the following comments after we've looked through everything today and spoken with Mike Egnor and the NSR Permitting Supervisor.

"Please ask Covestro to submit a Class I update to include Attachment A in their NSR permit. The company should also update the Attachment A with the current NSR permit numbers and should remove C-7000 from the table. I looked at the 45CSR21/27 Attachment for Chemours and instead of a column for "Original 45CSR13 Permit", their column has "Affected R13 Permit" with a note that the Affected R13 Permit refers to the most current version of that Permit. By changing Covestro's column to "Affected R13 Permit" this might eliminate the confusion of referencing NSR permits that have been superseded."

If you've got any questions, feel free to reach out to me for a phone call, as I have spent quite a long time today looking through these things.

Sincerely,

Nikki B. Moats

Title V Permit Writer

304-926-0499 ext 41282 or 304-414-1282

On Mon, Sep 25, 2023 at 10:33 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Thank you, Nikki. I will have comments back by Wednesday end of business day.

Cindi Lester, CSP

E&S Specialist



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[Cynthia.Lester1@covestro.com](mailto:Cynthia.Lester1@covestro.com)

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, September 25, 2023 7:08 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

The closest thing I have is a comparison of the new document versus the old using the tool in Microsoft Word. All of the noteworthy changes that aren't simply fixing capitalization or typos is mentioned in the Fact Sheet, but this should mark every change that has been made throughout the document.

On Fri, Sep 22, 2023 at 10:22 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki – would you be able to send me our revised Title V permit with red-lines (changes that are being made)? It would make it a lot easier for me to review. Thank you!

Cindi Lester, CSP  
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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Thursday, September 21, 2023 5:06 PM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

Attached you will find the Permit and Fact Sheet for this permit for your review. I've also sent these to Mike Egnor of the DEP so that he can review them as well. I'll keep you updated on any comments he may have after he has reviewed the files.

If you've got any questions or comments, please let me know.

Normally I would give a more exact time-table for these reviews, but I'm not sure how long Mike will need for his. For now, I would like to have any comments back by close of business next Thursday, September 28th.

Thanks,

Nikki

On Wed, Sep 13, 2023 at 10:03 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

I verified with DOW, but no there is not a requirement to have a temperature monitoring device on the fire box.

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, September 13, 2023 9:44 AM

**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

It looks like there's one more question in the comments that she put throughout section 7.0 that I need to confirm.

Is the facility required to have a temperature monitoring device on the firebox? This covers what I might need to add with regards to 40 C.F.R. 63.1429 and 63.1439.

Thanks,

Nikki Moats

On Tue, Sep 12, 2023 at 10:58 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I have confirmation from DOW that the boilers are both well over 44 megawatts.

The only "bypass" line on Covestro's side would be the vent stack used for nitrogen drying. That is confirmed to be slip blanked before PO Activation/deactivation occurs. It is only pulled for nitrogen drying (clean/fresh) step.

We have monitoring for maximum PO flow to powerhouse to prevent exceeding our permit limits, which we send a report to DOW on a monthly basis.

I believe this answers all of Carrie's questions. Please let me know if you have additional questions or need more information. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, September 11, 2023 11:29 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

My boss has a few questions in the form of comments on the attached permit draft regarding Subpart PPP monitoring for C-2070 and C-2070B that I was wanting to confirm with you before I added/edited the conditions to the permit in Section 7.0.

This was formerly in the permit incorporated by reference; however, that is not normally how we put conditions in the Title V permits. We're expanding it to properly show all applicable requirements instead.

Thanks,

Nikki Moats

On Tue, Aug 29, 2023 at 7:45 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

As promised. Let me know if you need anything else. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 2:00 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Yea, it's fine to get it sent to me tomorrow. I've got some other things I can work on in the meantime.

On Mon, Aug 28, 2023 at 1:44 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

If you don't mind, can I get this corrected and to you first thing in the morning? I had to work from home today. Let me know. If you need it today, I'll get someone from the office to help me. Thanks!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:26 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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It's not quite correct, it would want to reference something more along the lines of what I put below instead of referencing the continuous compliance determination method. You can word this differently if you'd prefer, this is just what I came up with based on what's currently in the permit.

These devices are considered *inherent process equipment* (as defined in §64.1) which are not included in the regulation's definition of a *control device*; therefore, these devices are not applicable to CAM under §64.2(a)(2).

On Mon, Aug 28, 2023 at 1:13 PM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

I thought that one last week but here it is. Let me know if the citation is correct. Thanks!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Monday, August 28, 2023 1:10 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
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Cindi,

It looks like there's one final APCD sheet that needs to be updated. The one for "Ex-2424 and H-2443". It is currently still using the non-applicability determination that the EPA no longer uses outside of CEMS.

Within the permit in condition 3.7.2 (4) regarding CAM non-applicability determination (I've attached a recent draft for convenience), there is a non-applicability determination that was used in the past for these devices. This particular one is still acceptable to the USEPA, but the APCD and the permit non-applicability determination need to match.

On Fri, Aug 25, 2023 at 9:12 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Nikki,

Please find attached the revised APCD forms for C-2016 and Y-2124 based on our phone call yesterday. I believe I have cited the correct reference in 40 CFR 64, but if I'm wrong please let me know.

C-2044 APCD form can be removed as this routes to Y-2124 thermal oxidizer.

D-2124A APCD form can be removed. I did verify that this scrubber was taken out of service several years ago. It was originally for incineration of VDC, but we no longer use VDC.

Please let me know if I've missed anything or if I need to make any more corrections. Thank you!

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 23, 2023 4:44 PM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service.

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM.

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit.

My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,

Nikki



On Wed, Aug 16, 2023 at 11:01 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

No worries. Attached is revised Section 2 of the permit application.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 10:25 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

On Wed, Aug 16, 2023 at 9:50 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote:

Per your request. Please let me know if you need anything else.

Cindi Lester, CSP

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**From:** Moats, Nikki B <[nikki.b.moats@wv.gov](mailto:nikki.b.moats@wv.gov)>  
**Sent:** Wednesday, August 16, 2023 8:45 AM  
**To:** Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)>  
**Subject:** Re: Title V Permit status update

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One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 2561O

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 2561O instead of M.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 8:06 AM Cynthia Lester <[cynthia.lester1@covestro.com](mailto:cynthia.lester1@covestro.com)> wrote: