

Good morning.

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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
E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

Mon, Sep 25, 2023 at 3:54 PM

Cindi,

I don't have a particular date, just sometime by the end of next week would be preferable.

On Mon, Sep 25, 2023 at 3:43 PM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

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



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, September 25, 2023 2:42 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, August 28, 2023 1:26 PM

To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, August 28, 2023 1:10 PM

To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP
E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

Sent: Monday, August 14, 2023 2:43 PM

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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
E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

2 attachments



image001.jpg
4K



image001.jpg
4K

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

Wed, Sep 27, 2023 at 1:25 PM

Nikki – I will get the Class I NSR permit update to you by the end of next week and will call with any questions. Thank you!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, September 25, 2023 3:55 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

Cindi,

I don't have a particular date, just sometime by the end of next week would be preferable.

On Mon, Sep 25, 2023 at 3:43 PM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

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



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, September 25, 2023 2:42 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the

content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

Sent: Monday, August 14, 2023 2:43 PM

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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
E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

Wed, Sep 27, 2023 at 1:27 PM

Nikki,

First of all I want to thank you for all of the work that you and your boss/team have put into updating our Title V Permit. I have no issues with the revisions. Everything looks to be correct.

Please let me know the next steps for getting the permit approved. Thank you!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If

you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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
E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

Tue, Oct 3, 2023 at 9:48 AM

I just noticed that the PO Storage Tanks in the North Charleston Tank Farm (T-9016 and T-9017) are still listed in our draft permit. DOW took ownership of those 2 tanks in December 2022. If you haven't already done so, please remove those from Section 1.1 (around page 13-14). My apologies for not catching that sooner!

Cindi Lester, CSP
E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> 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

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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
E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

Tue, Oct 3, 2023 at 10:07 AM

Nikki,

Do I need to fill out the Application form or is an email with the requested information sufficient? I've been told conflicting information in the past. Thank you!

Cindi Lester, CSP
E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, September 25, 2023 2:42 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP
E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

Tue, Oct 3, 2023 at 10:11 AM

Cindi,

I would treat this the same way we did for 2561O. I've attached the pdf version of that application here just for convenience.

No problem,
Nikki

On Tue, Oct 3, 2023 at 10:07 AM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Nikki,

Do I need to fill out the Application form or is an email with the requested information sufficient? I've been told conflicting information in the past. Thank you!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, September 25, 2023 2:42 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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

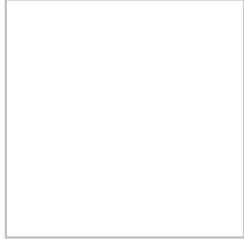
304-926-0499 ext 41282 or 304-414-1282

On Mon, Sep 25, 2023 at 10:33 AM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

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

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the

content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

Sent: Monday, August 14, 2023 2:43 PM

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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
E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

3 attachments



image001.jpg
4K



image001.jpg
4K



039-00102_APPL_13-2561O.pdf
676K

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

Tue, Oct 3, 2023 at 10:13 AM

Perfect! Thank you!

Cindi Lester, CSP
E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Tuesday, October 3, 2023 10:12 AM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

Cindi,

I would treat this the same way we did for 2561O. I've attached the pdf version of that application here just for convenience.

No problem,

Nikki

On Tue, Oct 3, 2023 at 10:07 AM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Nikki,

Do I need to fill out the Application form or is an email with the requested information sufficient? I've been told conflicting information in the past. Thank you!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, September 25, 2023 2:42 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Wednesday, August 16, 2023 8:45 AM

To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

Will do!

Cindi Lester, CSP
E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, August 14, 2023 2:43 PM

To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

Wed, Oct 11, 2023 at 1:28 PM

Cindi,

I spoke to the NSR Permitting supervisor about the removal of those tanks that DOW has taken ownership of. I think there is going to have to be some sort of NSR/TitleV permit application come in from DOW to officially move them over to their permit before I'm allowed to remove them from this one.

There has been a somewhat similar situation in the past with a facility that required the facility that was acquiring the tanks to have a minor modification before the other facility could officially relinquish the tanks.

I don't have too much information on this, so for more information, I would recommend contacting Beverly McKeone at 304-926-0499 ext 41280. I was only told that I was not able to do it as part of the NSR permit Administrative Update with the information that I had been given.

I went ahead and got this update through though, so that everything would be correct in Attachment A and it would properly be back into the permit. I just wanted to give you a heads up on the reason I may not currently be able to remove those tanks from the Title V/NSR permits.

Sincerely,
Nikki

On Tue, Oct 3, 2023 at 10:13 AM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Perfect! Thank you!

Cindi Lester, CSP
E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Tuesday, October 3, 2023 10:12 AM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

Cindi,

I would treat this the same way we did for 2561O. I've attached the pdf version of that application here just for convenience.

No problem,

Nikki

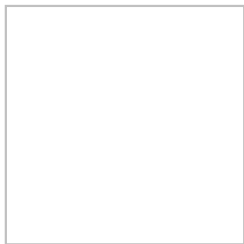
On Tue, Oct 3, 2023 at 10:07 AM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Nikki,

Do I need to fill out the Application form or is an email with the requested information sufficient? I've been told conflicting information in the past. Thank you!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, September 25, 2023 2:42 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> 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

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure,

send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Crtl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

2 attachments



image001.jpg
4K



image001.jpg
4K

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

Wed, Oct 11, 2023 at 1:31 PM

Nikki,

Thanks for the explanation. I will wait until DOW modifies their permit then will move forward with removing those tanks from our permit.

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Wednesday, October 11, 2023 1:29 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

Cindi,

I spoke to the NSR Permitting supervisor about the removal of those tanks that DOW has taken ownership of. I think there is going to have to be some sort of NSR/TitleV permit application come in from DOW to officially move them over to their permit before I'm allowed to remove them from this one.

There has been a somewhat similar situation in the past with a facility that required the facility that was acquiring the tanks to have a minor modification before the other facility could officially relinquish the tanks.

I don't have too much information on this, so for more information, I would recommend contacting Beverly McKeone at 304-926-0499 ext 41280. I was only told that I was not able to do it as part of the NSR permit Administrative Update with the information that I had been given.

I went ahead and got this update through though, so that everything would be correct in Attachment A and it would properly be back into the permit. I just wanted to give you a heads up on the reason I may not currently be able to remove those tanks from the Title V/NSR permits.

Sincerely,

Nikki

On Tue, Oct 3, 2023 at 10:13 AM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Perfect! Thank you!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Tuesday, October 3, 2023 10:12 AM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

Cindi,

I would treat this the same way we did for 25610. I've attached the pdf version of that application here just for convenience.

No problem,

Nikki

On Tue, Oct 3, 2023 at 10:07 AM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Nikki,

Do I need to fill out the Application form or is an email with the requested information sufficient? I've been told conflicting information in the past. Thank you!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

Covestro LLC

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, September 25, 2023 2:42 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP
E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

Covestro LLC

501 Second Ave

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> 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

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP
E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

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

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

Sent: Monday, August 14, 2023 2:43 PM

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

Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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
E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

Thu, Oct 12, 2023 at 12:09 PM

Cindi,

Here's the file we talked about on the phone.

--
Nikki

On Wed, Oct 11, 2023 at 1:31 PM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Nikki,

Thanks for the explanation. I will wait until DOW modifies their permit then will move forward with removing those tanks from our permit.

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Wednesday, October 11, 2023 1:29 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

Cindi,

I spoke to the NSR Permitting supervisor about the removal of those tanks that DOW has taken ownership of. I think there is going to have to be some sort of NSR/TitleV permit application come in from DOW to officially move them over to their permit before I'm allowed to remove them from this one.

There has been a somewhat similar situation in the past with a facility that required the facility that was acquiring the tanks to have a minor modification before the other facility could officially relinquish the tanks.

I don't have too much information on this, so for more information, I would recommend contacting Beverly McKeone at 304-926-0499 ext 41280. I was only told that I was not able to do it as part of the NSR permit Administrative Update with the information that I had been given.

I went ahead and got this update through though, so that everything would be correct in Attachment A and it would properly be back into the permit. I just wanted to give you a heads up on the reason I may not currently be able to remove those tanks from the Title V/NSR permits.

Sincerely,

Nikki

On Tue, Oct 3, 2023 at 10:13 AM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Perfect! Thank you!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Tuesday, October 3, 2023 10:12 AM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

Cindi,

I would treat this the same way we did for 2561O. I've attached the pdf version of that application here just for convenience.

No problem,

Nikki

On Tue, Oct 3, 2023 at 10:07 AM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Nikki,

Do I need to fill out the Application form or is an email with the requested information sufficient? I've been told conflicting information in the past. Thank you!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, September 25, 2023 2:42 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch / other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

State of West Virginia Mail - Title V Permit status update
Office: 304-746-8046 Covestro LLC
Cell: 304-410-6416 501 Second Ave
covestro.com South Charleston
E-mail West Virginia, 25303
Cynthia.Lester1@covestro.com

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP
E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Crtl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> wrote:

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

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

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> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, August 14, 2023 2:43 PM

To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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> 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

Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

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

E&S Specialist

Office: 304-746-8046

Covestro LLC

Cell: 304-410-6416

501 Second Ave

covestro.com

South Charleston

E-mail

West Virginia, 25303

Cynthia.Lester1@covestro.com

We are curious, courageous and colorful



DPPermit R30-03900102-2023 Carrie's comments part 7.docx

434K



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

Update to Permit Application R30-03900102-2022

2 messages

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

Mon, Jul 10, 2023 at 1:32 PM

Hello Ms. Lester,

After meeting with my supervisor late last week and again today, we have determined that we are going to need forms updated within the Title V permit application. We need the information updated to match the NSR permit revision and the Collaborative Agreement for when we send it to the EPA for their review. You can update this by sending in the updated forms along with a cover letter explaining what forms are being updated and why signed by the Responsible Official.

P.S. My phone has been having issues with inbound calls lately, so please email me if you would like to have a phone call to ask any questions.

Sincerely,
Nikki B. Moats (he/him/his)
West Virginia Department of Environmental Protection
Division of Air Quality
Title V Permit Writer
304-926-0499 ext 41282 or 304-414-1282

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

Mon, Jul 10, 2023 at 3:06 PM

Nikki,

I wanted to let you know that I received your email and will start working on the forms. I will email you to set up a phone call if I have any questions. Thank you!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, July 10, 2023 1:33 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Update to Permit Application R30-03900102-2022

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | **deutsch / other Languages**

[Quoted text hidden]



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

Title V Permit Inquiries

7 messages

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

Thu, Dec 22, 2022 at 10:57 AM

Nikki,

Please find below the information you requested regarding our Title V Permit Renewal submitted earlier this year.

1. The changes in the dates on several of the tanks were a result of changing the service of the tank. There were no replacements in kind. The tanks stayed the same. The revised dates were the date that the service changed, which I considered a "modification". If my interpretation is incorrect, then the original dates should be what is already in the permit. The same goes for T-103. The tank remained the same; however it went from a double compartment tank to a single compartment tank.
2. K-5331 – the current emission point noted in the Permit is E-3100. It is being requested to change the Emission Point ID to E-5228A (based on Process Flow Drawings). There is no change in the emission point itself. It's the naming of the emission point that needs to be changed. This revision was also requested by James White in the 2016 Title V Permit renewal. I'm not sure why it wasn't changed during the last 5-year renewal.
3. EO Distribution – equipment not yet installed. Need PTE for this equipment. I am looking into this request. This was a planned project back in 2016 and has not been installed. I'll need to review the project files and get back to you. I hope to have it around the first week of January.

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

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

Thu, Jan 5, 2023 at 1:11 PM

Nikki,

In regards to your question regarding the Potential to Emit for the EO Distribution equipment that is not yet installed, I have reviewed the project files and the PTE for this equipment is 0.19 Tons/year. This PTE was submitted to the WVDEP during the Reg13 and Title V Permit modifications and approved in late 2014. The PTE number is based upon the design of the distribution system with a maximum of 19,000 lbs/year of EO going into the scrubber at a 98% destruction efficiency.

Please let me know if you have any additional questions. Thanks!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

[Quoted text hidden]

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

Thu, Jan 5, 2023 at 1:42 PM

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

From: **Cynthia Lester** <cynthia.lester1@covestro.com>
Date: Thu, Dec 22, 2022 at 10:57 AM
Subject: Title V Permit Inquiries
To: Moats, Nikki B <nikki.b.moats@wv.gov>
Cc: Matthew Harris <matthew.harris@covestro.com>

[Quoted text hidden]

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

Thu, Jan 5, 2023 at 2:35 PM

Cynthia,

Thanks for all of the information. I have two further questions and something I wanted to let you know before the EPA looks at the permit. An unfinished draft is attached for convenience.


Are there supposed to be more Subpart Kb requirements that need to be added for a closed vent system and control device? There is a citation for Subpart Kb in permit condition 4.1.4 and we wanted to get further clarification to ensure we haven't missed anything.

Permit condition 3.7.2 used to have parametric monitoring as a continuous monitoring method to be exempt from CAM (parts(1) and (2) of the list); however, the EPA now only defines continuous monitoring as CEMS. It is likely that the EPA asks us to add CAM citations to some of the existing requirements and remove this from non-applicability.

For part (3) of the CAM non-applicability we need some further explanation of the system and how C-2044 is a control device so that we can send it to the EPA when we send the permit to them for review.

Thanks,
Nikki B. Moats
Title V Permit Writer
304-926-0499 ext. 41282

[Quoted text hidden]

 **DPPermit R30-03900102-2023.docx**
424K

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

Thu, Jan 5, 2023 at 2:40 PM

Let me look into it and I'll get back to you as soon as possible.

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Thursday, January 5, 2023 2:35 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Cc: Matthew Harris <matthew.harris@covestro.com>
Subject: Re: FW: Title V Permit Inquiries

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

[Quoted text hidden]

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

Tue, Jan 10, 2023 at 9:21 AM

Nikki,

Please find below my responses **in red font** to your last email. Let me know if you have any questions or need additional information.

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

covestro.com

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

We are curious, courageous and colorful

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Thursday, January 5, 2023 2:35 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Cc: Matthew Harris <matthew.harris@covestro.com>
Subject: Re: FW: Title V Permit Inquiries

CAUTION: This email originated from outside Covestro. **DO NOT CLICK** on links and **DO NOT OPEN** attachments unless you recognize the sender and know the content is safe. If you are unsure, send this email as an attachment using Ctrl+Alt+F (Ctrl+Alt+O for Spanish) to check_mail@covestro.com | [deutsch](#) / [other Languages](#)

Cynthia,

Thanks for all of the information. I have two further questions and something I wanted to let you know before the EPA looks at the permit. An unfinished draft is attached for convenience.

Are there supposed to be more Subpart Kb requirements that need to be added for a closed vent system and control device? There is a citation for Subpart Kb in permit condition 4.1.4 and we wanted to get further clarification to ensure we haven't missed anything. **To my knowledge there are no additional requirements for the two tanks listed in our permit that are subject to Subpart Kb.**

Permit condition 3.7.2 used to have parametric monitoring as a continuous monitoring method to be exempt from CAM (parts(1) and (2) of the list); however, the EPA now only defines continuous monitoring as CEMS. It is likely that the EPA asks us to add CAM citations to some of the existing requirements and remove this from non-applicability. **The equipment listed in parts 1 and 2 of this permit condition are continuously monitored by our control room operators and our digital control system (DCS). All have set alarms, which sound in the Control Room if the flow or temperature are detected outside of the set limits. Three have interlocks, the valves will automatically close if an upset condition is found. The Waste Gas header has a high flow alarm and interlock as well, this being an safety critical alarm.**

For part (3) of the CAM non-applicability we need some further explanation of the system and how C-2044 is a control device so that we can send it to the EPA when we send the permit to them for review. **C-2044 is our Mon/MACT Steam Stripper column which strips Isopropanol, Styrene, and Acrylonitrile (ACN), out of the Tank 616 feed stream with the overhead vapors being condensed/decanted. This process removes and collects contamination from our wastewater stream. The "oil" layer consisting mainly of ACN, Styrene and Isopropanol is batch pumped to Tank 693 (hazardous waste monomer storage waste tank). Water is continuously fed to the C-2044 and is used as a reflux stream to the column. The decanted wastewater is pumped by the Stripper Feed Pumps through the Steam Stripper Preheater into the top of C-2044 Steam Stripper. The goal here is to get as much non-ACN organic out of the column tails as possible. C-2044 is designed to provide the removal of at least 99% of the inlet HAPs (ACN and Styrene). The stripped wastewater collects is continuously pumped to the ACN Treater and the sole purpose of the ACN Treater is to destroy ACN using high temperature, NaOH addition, and residence time.**

[Quoted text hidden]

[Quoted text hidden]

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

Tue, Jan 10, 2023 at 2:59 PM

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

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

[Quoted text hidden]

[Quoted text hidden]