



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

Further information about RIK the tanks.

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

Wed, May 4, 2022 at 3:31 PM

Nikki,

Attached is the updated PTE form which includes PM2.5, PM10 and PM TSP. We will have the Permit Determinations as soon as we can.

[Quoted text hidden]

[Quoted text hidden]



Updated PTE Sheet 05042022.pdf

48K

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	19.3
Nitrogen Oxides (NO _x)	4.79
Lead (Pb)	
Particulate Matter (PM _{2.5}) ¹	0.02
Particulate Matter (PM ₁₀) ¹	0.02
Total Particulate Matter (TSP)	0.02
Sulfur Dioxide (SO ₂)	
Volatile Organic Compounds (VOC)	56.98
Hazardous Air Pollutants ²	Potential Emissions
DMF	2.91
Methanol	6.66
Regulated Pollutants other than Criteria and HAP	Potential Emissions

¹PM_{2.5} and PM₁₀ are components of TSP.
²For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.



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

Further information about RIK the tanks.

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

Wed, May 4, 2022 at 1:44 PM

Nikki,

I am meeting with our consultant this afternoon to get them started. Hopefully we will have them ready very soon. We will submit PD's for the AM83 Stripper Feed Tank along with one for DMF01 – 10 Tank Catalyst Storage Tank.

[Quoted text hidden]

[Quoted text hidden]



039-00001_PERM_PD17-058.pdf

67K



west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone 304/926-0475 • FAX: 304/926-0479

Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.dep.wv.gov

October 18, 2017

Timothy L. Byrd
The Chemours Company FC, LLC
901 West DuPont Ave.
Belle, WV 25015

RE: Permit Applicability Determination
The Chemours Company FC, LLC
Washington Works
Determination No. PD17-058
Plant ID No. 03900001

Dear Mr. Byrd:

It has been determined that a permit will not be required under 45CSR13 to return ammonia storage from storage tank (AM98) back to storage tank (AM79). The change to the Dimethyl Amine (DMA) storage tank (AM98) which replaced storage tank (AM55) was due to the ammonia storage tank (AM79) being taken out of service for cleaning. The cleaning has been completed, and ammonia will again be stored in storage tank (AM79). Storage Tank (AM98) will return to storing DMA. This determination is based on information included with your permit determination form dated September 21, 2017 and received on September 25, 2017, which indicates that there will be no emissions increase of criteria pollutants. Additionally, there will be no increase in Hazardous Air Pollutants (HAPs); or, trigger any new substantive requirements of any State or Federal air quality regulation.

Please bear in mind, however, that any additional changes to the proposed facility may require a permit under 45CSR13. Furthermore, pursuant to 45CSR13-5.14, records briefly describing the proposed change, the pollutants involved, the potential to emit for each pollutant increased or added shall be maintained by the owner or operator for at least two years and made available to the Director upon request.

Should you have any questions, please contact the undersigned engineer at (304) 926-0499 ext. 1208 or michael.egnor@wv.gov.

Sincerely,

Mike Egnor
Engineer



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

R30-03900693-2022 for your review

Hodge, Michael <Michael.Hodge@bellechemco.com>
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>
Cc: Grant Morgan <Grant.Morgan@erm.com>

Fri, Apr 15, 2022 at 8:39 AM

Mr. Moats,

Thank you for the opportunity to review the draft Title V Permit for the Belle Chemical operations. We would like to provide the following comments based upon our review.

The first group of comments that we are providing are all related to table 1 of the permit. In the instances noted below, the draft permit did not match the permit application with some revised dates of construction. They are outline as follows:

- AMF13 – RIK 2020
- DMF03 – 2013
- DMF04 – 2014
- DMF17 – 2012
- DMF21 – 2012
- DMF22 – 2014
- DMF01 – 10 Tank – RIK 2018
- DMF 18 – RIK 2021
- DMF19 – RIK 2021
- AM83 – RIK 2011
- AM84 – RIK 2011

In our review, we noted that DMF26 has a listed emission point ID of 402.004. We provide a comment that this should be updated to 402.001.

DMF28 – can you please update this to reflect the tank as OOS. Please refer to the notification of update email sent from Michael Hodge on 10/13/2021.

We noticed that permit condition 4.1.14 includes a strike through for the identification of the Consent Order that is no longer active. We'd just like to provide comment to ensure that strikethrough is not included in the draft permit for public notice.

Our final comment is related to the updated permit conditions of R13-3230C and ensuring that this is properly covered within the Title V. The permit was issued in October of 2021, so after the submittal of the Title V Renewal application. Many of the conditions already included in the Title V are the same conditions as included in the R13,

but we were unable to match up, permit condition by permit condition, to ensure the limits and MRR requirements of the updated R13 were reflected in the Title V. We provide comment to ask please confirm that the recently issued R13 is fully captured in the Title V.

Thank you for the ability to review the draft permit and please reach out with questions or comments.

Thanks,

Mike



Mike Hodge

PCC/RCC

michael.hodge@bellechemco.com

304-513-0219 (office)

681-254-8667 (mobile)

901 W. Dupont Ave.

Belle, WV 25015



www.bellechemco.com

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, April 11, 2022 1:19 PM
To: Hodge, Michael <Michael.Hodge@bellechemco.com>
Subject: R30-03900693-2022 for your review

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

[Quoted text hidden]

Legal Notice

This electronic communication, including any attachments, contains information from Cornerstone Chemical Company or its subsidiaries that may be legally privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient, any use or dissemination of this communication or its attachment(s) is strictly prohibited and may be illegal. If you have received this communication in error, please notify the sender immediately, destroy any printed copies and delete it from all computers on which it may be stored.

Cornerstone Chemical Company

Division of Air Quality Permit Application Submittal

Please find attached a permit application for :

[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only):
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only):

- Type of NSR Application (check all that apply):
 - Construction
 - Modification
 - Class I Administrative Update
 - Class II Administrative Update
 - Relocation
 - Temporary
 - Permit Determination

- Type of 45CSR30 (TITLE V) Application:
 - Title V Initial
 - Title V Renewal
 - Administrative Amendment**
 - Minor Modification**
 - Significant Modification**
 - Off Permit Change

****If the box above is checked, include the Title V revision information as ATTACHMENTS to the combined NSR/Title V application.**

- Payment Type:
 - Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
 - Check (Make checks payable to: WVDEP – Division of Air Quality)
Mail checks to:
WVDEP – DAQ – Permitting
Attn: NSR Permitting Secretary
601 57th Street, SE
Charleston, WV 25304

- If the permit writer has any questions, please contact (all that apply):
 - Responsible Official/Authorized Representative
 - Name:
 - Email:
 - Phone Number:
 - Company Contact
 - Name:
 - Email:
 - Phone Number:
 - Consultant
 - Name:
 - Email:
 - Phone Number:

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

Belle Chemical Company
901 West DuPont Avenue
Belle, WV 25015



August 12, 2021

Director
WV Department of Environmental Protection (WVDEP)
Division of Air Quality (DAQ)
601 57th Street SE
Charleston, WV 25304

Re: Belle Chemical Company
Belle, WV Facility (Facility ID: 039-00693)
Title V Operating Permit Renewal Application

Dear Director,

In accordance WV 45CSR30, please find the attached Title V permit renewal application for Belle Chemical, which is located in Belle, West Virginia. Belle Chemical currently operates under Permit No. R30-03900693-2017 under 45CSR30. The current Title V Permit to Operate expires on February 13, 2022. In December 2019, the Chemours Company FC, LLC (03900001) sold part of their facility to the Belle Chemical Company. DAQ approved the transfer in a letter signed on February 20, 2020. R13-3230B was issued to incorporate and supersede the consent order requirements for the part of the company being sold.

This package contains the general application forms along with the required attachments for a Title V renewal permit application.

Belle Chemical Company requests to make the following administrative updates to the current permit that do not impact the existing Potential To Emit (PTE). These changes are characterized as administrative updates or amendments to typographic errors where the issued permit does not match information submitted with previous Title V applications:

- DMF25 – Product Cooler is not routed to a control device.
- DMF29 – S-113 Tank is not routed to a control device.

In addition, the following pieces of equipment are not listed in the current permit and information has not been previously provided in permit applications. Based upon the basis of the emission calculations and PTE, the inclusion of this equipment does not cause an increase in the facility PTE. Belle Chemical requests this equipment is added to the permit for completeness and inclusion:

- 40,000 gallons Tank 6 – Amines (routed to control device, AMCD01);
- 15,000 gallons Vertical Vessel – No. 2 Distillation Column (routed to control device, AMCD01); and
- DMAC Product Cooler (routed to Tanks 14, 16 or 35).

With the acquisition of the covered equipment contained within the permit application, the PTE of Belle Chemical's operations do not currently exceed the Title V Program Applicability Thresholds. Belle Chemical has evaluated submitting a Title V Inactive application, however, has decided not to pursue Title V Inactive Status based upon potential future expansion plans. Belle Chemical wishes to renew their existing Title V permit to retain the existing operational permit.

Belle Chemical Company
901 West DuPont Avenue
Belle, WV 25015

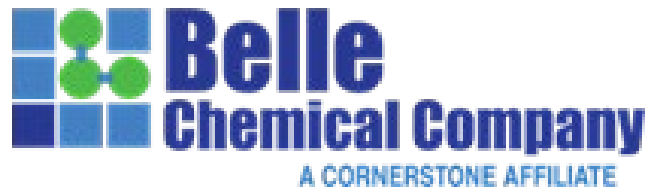


Should you have any questions regarding the application or if additional information is required, please contact me by email at Michael.Hodge@bellechemco.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Hodge", written in a cursive style.

Mike Hodge
PCC/RCC
Belle Chemical Company



Belle Chemical Company

Air Permit Application for Renewal Belle Facility

Belle, West Virginia

Prepared By:



**ENVIRONMENTAL RESOURCES MANAGEMENT, Inc.
Hurricane, West Virginia**

August 2021



**WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL
PROTECTION
DIVISION OF AIR QUALITY**

601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475

www.dep.wv.gov/daq

Received
August 13, 2021
WV DEP/Div of Air Quality

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

<p>1. Name of Applicant (As registered with the WV Secretary of State's Office): Belle Chemical Company</p>	<p>2. Facility Name or Location: Belle Plant</p>
<p>3. DAQ Plant ID No.: <div style="text-align: center; margin-left: 40px;"> <u> 0 3 9 </u> <u> </u> <u> 0 0 6 9 3 </u> </div> </p>	<p>4. Federal Employer ID No. (FEIN): 84-3929152</p>
<p>5. Permit Application Type:</p> <p> <input type="checkbox"/> Initial Permit When did operations commence? <input checked="" type="checkbox"/> Permit Renewal What is the expiration date of the existing permit? <input type="checkbox"/> Update to Initial/Renewal Permit Application </p>	
<p>6. Type of Business Entity:</p> <p> <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Governmental Agency <input type="checkbox"/> LLC <input type="checkbox"/> Partnership <input type="checkbox"/> Limited Partnership </p>	<p>7. Is the Applicant the:</p> <p> <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Both </p> <p>If the Applicant is not both the owner and operator, please provide the name and address of the other party.</p>
<p>8. Number of onsite employees: 60</p>	
<p>9. Governmental Code:</p> <p> <input checked="" type="checkbox"/> Privately owned and operated; 0 <input type="checkbox"/> County government owned and operated; 3 <input type="checkbox"/> Federally owned and operated; 1 <input type="checkbox"/> Municipality government owned and operated; 4 <input type="checkbox"/> State government owned and operated; 2 <input type="checkbox"/> District government owned and operated; 5 </p>	
<p>10. Business Confidentiality Claims</p> <p>Does this application include confidential information (per 45CSR31)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY" guidance.</p>	

11. Mailing Address		
Street or P.O. Box: 901 West DuPont Avenue		
City: Belle	State: WV	Zip: 25015
Telephone Number: () -	Fax Number: () -	

12. Facility Location		
Street: 901 West DuPont Avenue	City: Belle	County: Kanawha
UTM Easting: 4,232.589 km	UTM Northing: 451.848 km	<input checked="" type="checkbox"/> <input type="checkbox"/>
Directions: Exit U.S. Route 60 at the Belle exit; turn right onto old Route 60; travel 500 feet west; t urn left to enter the main gate of the DuPont Belle plant.		
----- <input type="checkbox"/> --- <input checked="" type="checkbox"/> ---		
AS AGENCY FACILITY WITHIN A REGULATED AREA: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If yes, for what air pollutants?	
AS AGENCY FACILITY WITHIN 50 MILES OF REGULATED AREA: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If yes, name the affected state(s).	
AS AGENCY FACILITY WITHIN 500 MILES OF CLASS I AREA: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If yes, name the area(s).	
ARE NO, OR EMISSIONS IMPACT A CLASS I AREA: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
¹ Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.		

13. Contact Information		
Responsible Official: Alichia Hunt		Title: Operations Manager
Street or P.O. Box: 901 W. Dupont Ave.		
City: Belle	State: WV	Zip: 25015
Telephone Number: (304) 513-0202	Fax Number: () -	
E-mail address: Alichia.Hunt@bellechemco.com		
Environmental Contact: Michael Hodge		Title: Process Compliance Coordinator
Street or P.O. Box: 901 W. Dupont Ave.		
City: Belle	State: WV	Zip: 2515
Telephone Number: (304) 513 - 0219	Fax Number: () -	
E-mail address: Michael.Hodge@bellechemco.com		
Application Preparer: Grant Morgan		Title: Principal Consultant
Company: ERM (Environmental Resources Managment)		
Street or P.O. Box: 204 Chase Drive		
City: Hurricane	State: WV	Zip: 25526
Telephone Number: (304) 590 - 6160	Fax Number: () -	
E-mail address: Grant.Morgan@erm.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Chemical	Methylamines and organic chemical intermediates	325199	2869

Provide a general description of operations.

Belle Chemical Company produces specialty chemical intermediates. The process units included are methylamines [monomethylamine (MMA), dimethylamine (DMA), and trimethylamine (TMA)], and amides [dimethylformamide (DMF), monomethylformamide (MMF), and dimethylacetamide (DMAC)].

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**.

For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR34)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS	<input checked="" type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input checked="" type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input checked="" type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input checked="" type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input type="checkbox"/> CAIR NO _x Annual Trading Program (45CSR39)	<input type="checkbox"/> CAIR NO _x Ozone Season Trading Program (45CSR40)
<input type="checkbox"/> CAIR SO ₂ Trading Program (45CSR41)	

19. Non Applicability Determinations
<p>List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.</p> <p style="text-align: center; font-size: 24pt; margin-top: 100px;">See existing permit R30-03900693-2017</p>
<input type="checkbox"/> Permit Shield

19. Non Applicability Determinations (Continued) - Attach additional pages as necessary.

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

See existing permit R30-03900693-2017

Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

All Facility-wide requirements in existing permit are still applicable.

Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See existing permit R30-03900693-2017

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

20. Facility-Wide Applicable Requirements (Continued) - Attach additional pages as necessary.

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

See existing permit R30-03900693-2017

Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See existing permit R30-03900693-2017

ARE YOU IN COMPLIANCE WITH ALL FACILITY-WIDE APPLICABLE REQUIREMENTS? YES NO

If no, complete the **Schedule of Compliance Form** as ATTACHMENT F.

21. Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit <i>(if any)</i>
R30-03900693-2017 (MM01)	02/13/2017	
R13-3230B	01/13/2020	
R13-3230C	Received 06/30/2021 (in process, not issued)	

22. Inactive Permits/Obsolete Permit Conditions

Permit Number	Date of Issuance	Permit Condition Number

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	19.30
Nitrogen Oxides (NO _x)	4.79
Lead (Pb)	
Particulate Matter (PM _{2.5}) ¹	
Particulate Matter (PM ₁₀) ¹	
Total Particulate Matter (TSP)	
Sulfur Dioxide (SO ₂)	
Volatile Organic Compounds (VOC)	56.98
Hazardous Air Pollutants ²	Potential Emissions
DMF	2.91
Methanol	6.66
Regulated Pollutants other than Criteria and HAP	Potential Emissions

¹PM_{2.5} and PM₁₀ are components of TSP.
²For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input checked="" type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input checked="" type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input type="checkbox"/>	7. Blacksmith forges.
<input type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
<input checked="" type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input checked="" type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input checked="" type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input type="checkbox"/>	18. Emergency road flares.
<input type="checkbox"/>	19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO _x , SO ₂ , VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:

24. Insignificant Activities (Check all that apply)	
<input type="checkbox"/>	20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27. Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input checked="" type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
<input checked="" type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input checked="" type="checkbox"/>	26. Fire suppression systems.
<input checked="" type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input checked="" type="checkbox"/>	29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
<input type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input checked="" type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input checked="" type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input checked="" type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input checked="" type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
<input type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input checked="" type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input checked="" type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input checked="" type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input type="checkbox"/>	51. Steam cleaning operations.
<input checked="" type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input checked="" type="checkbox"/>	54. Steam vents and safety relief valves.
<input type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input checked="" type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input checked="" type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table
Fill out the Title V Equipment Table and provide it as ATTACHMENT D .
26. Emission Units
For each emission unit listed in the Title V Equipment Table , fill out and provide an Emission Unit Form as ATTACHMENT E .
For each emission unit not in compliance with an applicable requirement, fill out a Schedule of Compliance Form as ATTACHMENT F .
27. Control Devices
For each control device listed in the Title V Equipment Table , fill out and provide an Air Pollution Control Device Form as ATTACHMENT G .
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the Compliance Assurance Monitoring (CAM) Form(s) for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as ATTACHMENT H .

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

Note: This Certification must be signed by a responsible official. The original, signed in blue ink, must be submitted with the application. Applications without an original signed certification will be considered as incomplete.

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Alicha Hunt	Title: Operations Manager
--------------------------	----------------------------------

Responsible official's signature:

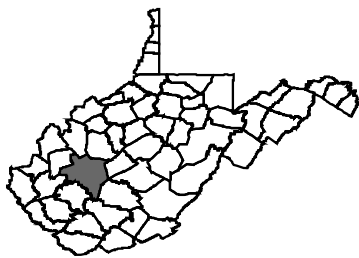
Signature: *Alicha Hunt* Signature Date: 8/12/21
(Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:

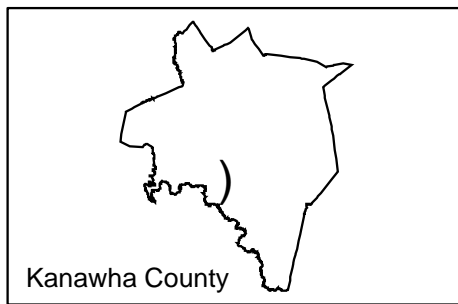
- | | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | ATTACHMENT A: Area Map |
| <input checked="" type="checkbox"/> | ATTACHMENT B: Plot Plan(s) |
| <input checked="" type="checkbox"/> | ATTACHMENT C: Process Flow Diagram(s) |
| <input checked="" type="checkbox"/> | ATTACHMENT D: Equipment Table |
| <input checked="" type="checkbox"/> | ATTACHMENT E: Emission Unit Form(s) |
| <input type="checkbox"/> | ATTACHMENT F: Schedule of Compliance Form(s) |
| <input checked="" type="checkbox"/> | ATTACHMENT G: Air Pollution Control Device Form(s) |
| <input type="checkbox"/> | ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s) |

All of the required forms and additional information can be found and downloaded from, the DEP website at www.dep.wv.gov/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

Attachment A



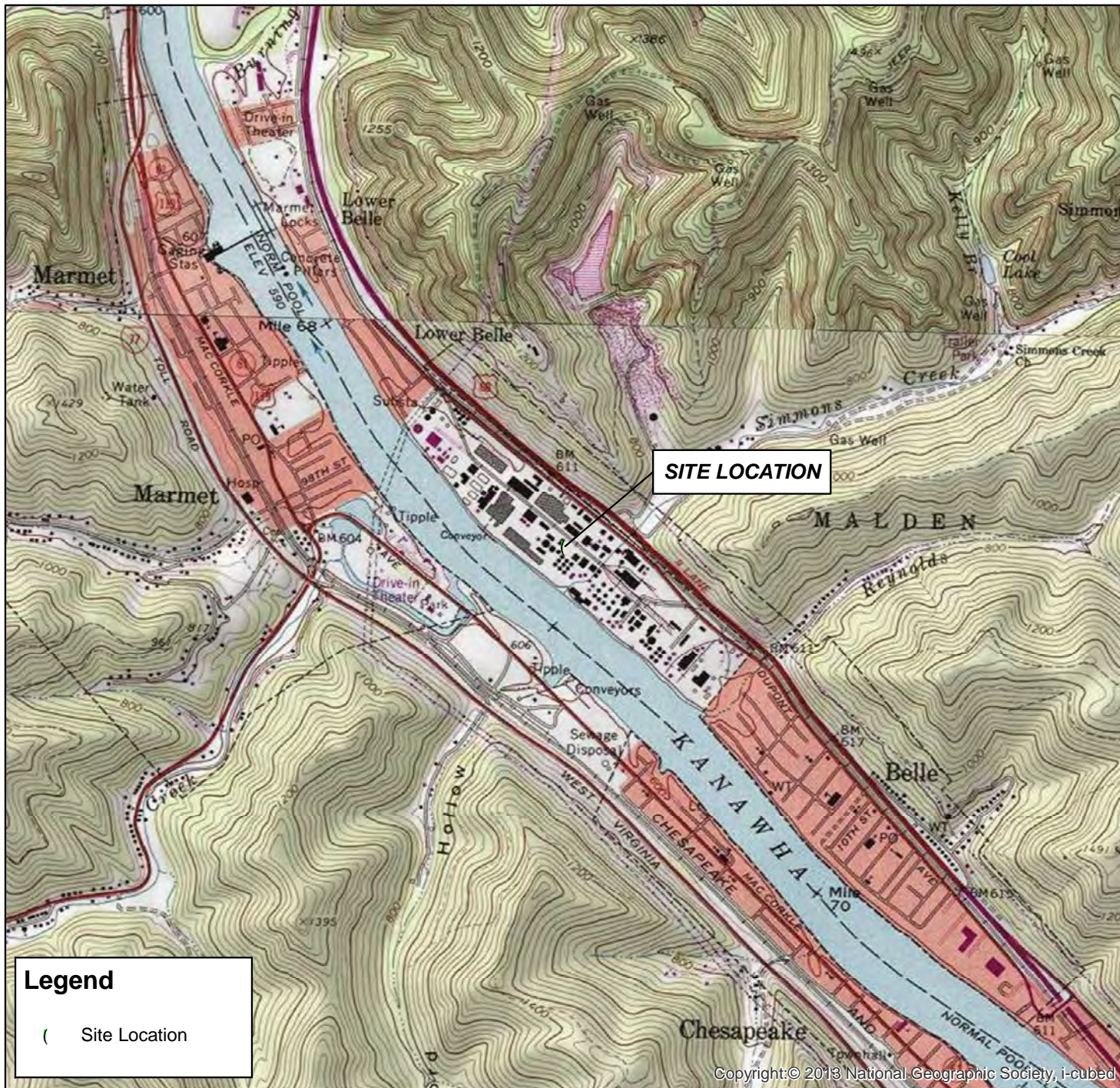
West Virginia



Kanawha County



LAT. 38.241736 LON. -81.55273
KANAWHA COUNTY
WEST VIRGINIA



Legend

(Site Location

USGS 1:24K 7.5' Quadrangle:
Burnaugh, WV

SITE LOCATION MAP

Belle Chemical Company

Belle Chemical Company
901 West DuPont Avenue
Belle, West Virginia 25015

GIS Review: AA

CHK'D: AA

0604538

Drawn By:
SRV-7/26/21

Environmental Resources Management

ATTACHMENT A

J:\Projects\SiteLocation\Map\Belle Chemical Company\Map\DATA\CHM\NTA-SiteLocationMap_BelleChemicalPlatn_20210726.mxd - 7/26/2021\RSV

Attachment B

REDACTED COPY – CLAIM OF CONFIDENTIALITY

Attachment C

REDACTED COPY – CLAIM OF CONFIDENTIALITY

Attachment D

ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
402.001	AMCD01	AM01	Tank	4972 gal	1972
402.001	AMCD01	AM02	Tank	527 gal	1960
402.001	AMCD01	AM03	Tank	4972 gal	1960
402.001	AMCD01	AM04	Tank	4972 gal	1959
402.001	AMCD01	AM05	Tank	10,000 gal	1965
402.001	AMCD01	AM06	Tank	1200 gal	1993
402.001	AMCD01	AM07	Heat Exchanger	785 sq ft	1969; RIK 2011
402.001	AMCD01	AM08	Heat Exchanger	470 sq ft	1980; RIK 2014
402.001	AMCD01	AM09	Heat Exchanger	589 sq ft	1981
402.001	AMCD01	AM10	Tank	500 gal	orig 1968; RIK 1995
402.001	AMCD01	AM11	Heat Exchanger	5110 sq ft	1973
402.001	AMCD01	AM12	Heat Exchanger	1843 sq ft	1985
402.001	AMCD01	AM13	Heat Exchanger	880 sq ft	orig 1977; RIK 2020
402.001	AMCD01	AM14	Heat Exchanger	880 sq ft	orig 1977; RIK 1998
402.001	AMCD01	AM15	Heat Exchanger	880 sq ft	orig 1977; RIK 2000
402.001	AMCD01	AM16	Heat Exchanger	880 sq ft	orig 1977; RIK 2001
402.001	AMCD01	AM17	Heat Exchanger	880 sq ft	spare; not in service
402.001	AMCD01	AM18	Heat Exchanger	2710 sq ft	orig 1977; RIK 1998
402.001	AMCD01	AM19	Heat Exchanger	3079 sq ft	1997
402.001	AMCD01	AM20	Heat Exchanger	6667 Watts	1972; RIK 2006
402.001	AMCD01	AM21	Heat Exchanger	6667 Watts	1972; RIK 2006
402.001	AMCD01	AM22	Heat Exchanger	1832 sq ft	1960; RIK 2006
402.001	AMCD01	AM23	Heat Exchanger	2686 sq ft	1998; RIK 2006
402.001	AMCD01	AM24	Reactor	4126 gal	1969; RIK 2020

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as
insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/ Modified
402.001	AMCD01	AM25	Heat Exchanger	416 sq ft	1993
402.001	AMCD01	AM26	Distillation Column	d=42" h=75'	2000 RIK
402.001	AMCD01	AM27	Tank	485 gal	1977
402.001	AMCD01	AM28	Heat Exchanger	942 sq ft	1977
402.001	AMCD01	AM29	Heat Exchanger	260 sq ft	1993
402.001	AMCD01	AM30	Heat Exchanger	314 sq ft	1993
402.001	AMCD01	AM31	Heat Exchanger	1571 sq ft	2002
402.001	AMCD01	AM32	Heat Exchanger	9713 sq ft	2003 RIK
402.001	AMCD01	AM33	Heat Exchanger	366 sq ft	1995
402.001	AMCD01	AM34	Heat Exchanger	1445 sq ft	1984
402.001	AMCD01	AM35	Distillation Column	d=96" h=129'	1968
402.001	AMCD01	AM36	Heat Exchanger	2730 sq ft	1993
402.001	AMCD01	AM37	Heat Exchanger	366 sq ft	1997
402.001	AMCD01	AM38	Heat Exchanger	1510 sq ft	2003 RIK
402.001	AMCD01	AM39	Distillation Column	d=108" h=121'	1968
402.001	AMCD01	AM40	Tank	580 sq ft	1997
402.001	AMCD01	AM41	Heat Exchanger	3930 sq ft	1987
402.001	AMCD01	AM42	Heat Exchanger	251 sq ft	1960
402.001	AMCD01	AM43	Heat Exchanger	1826 sq ft	1977
402.001	AMCD01	AM44	Distillation Column	d=48" h=99'	1963
402.001	AMCD01	AM45	Tank	485 gal	1977
402.001	AMCD01	AM46	Heat Exchanger	482 sq ft	1986
402.001	AMCD01	AM47	Heat Exchanger	4646 sq ft	1969
402.001	AMCD01	AM48	Heat Exchanger	245 sq ft	1963

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ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as
insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
402.001	AMCD01	AM49	Heat Exchanger	245 sq ft	1969
402.001	AMCD01	AM50	Product Loading		pre-1966
402.001	AMCD01	AM51	Tank	32,100 gal	1963
402.001	AMCD01	AM52	Tank	43,000 gal	1969
402.001	AMCD01	AM53	Tank	182,800 gal	1977
402.001	AMCD01	AM54	Tank	182,800 gal	1977
402.001	AMCD01	AM55	Tank	30,000 gal	1962; RIK 2017
402.001	AMCD01	AM56	Tank	30,000 gal	1960
402.001	AMCD01	AM57	Tank	30,000 gal	1960
402.001	AMCD01	AM58	Tank	784,100 gal	1963
402.001	AMCD01	AM59	Tank	784,100 gal	1963
402.001	AMCD01	AM60	Tank	30,000 gal	1977
402.001	AMCD01	AM61	Tank	108,400 gal	1963
402.001	AMCD01	AM62	Tank	784,100 gal	1963
402.001	AMCD01	AM63	Mixer		1979
402.001	AMCD01	AM64	Heat Exchanger	302 sq ft	1979
402.001	AMCD01	AM65	Heat Exchanger	302 sq ft	1979
402.001	AMCD01	AM66	Filter		1980
402.001	AMCD01	AM67	Tank	25,900 gal	1963
402.001	AMCD01	AM68	Mixer		1979
402.001	AMCD01	AM69	Heat Exchanger	302 sq ft	1979
402.001	AMCD01	AM70	Heat Exchanger	302 sq ft	1979
402.001	AMCD01	AM71	Filter		1980
402.001	AMCD01	AM72	Tank	24,000 gal	1963

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as
insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/ Modified
402.001	AMCD01	AM73	Mixer		1979
402.001	AMCD01	AM74	Heat Exchanger	302 sq ft	1979
402.001	AMCD01	AM75	Heat Exchanger	302 sq ft	1979
402.001	AMCD01	AM76	Filter		1980
402.001	AMCD01	AM77	Tank	24,000 gal	1977
402.001	AMCD03	AM78	Tank	2.5MM gal	1956
AE.001	AMCD02	AM79	Tank	20,000 ton	1966
AE.001	AMCD02	AM80	Heat Exchanger		1980
AE.001	AMCD02	AM81	Heat Exchanger		1980
402.001	AMCD01	AM82	Tank	50,000 gal	1935
402.001	AMCD01	AM99	Distillation Column	15,000 Gallon	1963
402.001	AMCD01	AM100	Tank	40,000 Gallons	1982
Wastewater Stripping					
402.001	AMCD01	AM83	Tank	300000 gal	1977; RIK 2011
402.001	AMCD01	AM84	Blower	80 SCFM at 7.5 psig	1994; RIK 2011
402.001	AMCD01	AM85	Heat Exchanger	565 sq ft	1977
402.001	AMCD01	AM86	Heat Exchanger	440 sq ft	1977
402.001	AMCD01	AM87	Heat Exchanger	2858 sq ft	1977
402.001	AMCD01	AM88	Column	h=65' d=3.5'	1977
402.001	AMCD01	AM89	Heat Exchanger	1140 sq ft	1977
402.001	AMCD01	AM90	Tank	235 gal	1976
Vent Recovery System					
402.001	AMCD01	AM91	Column	h=39' d=17"	1960
402.001	AMCD01	AM92	Column	h=38' d=18"	orig 1960; RIK1997
402.001	AMCD01	AM93	Tank	350 gal	1974
402.001	AMCD01	AM94	Heat Exchanger	40 sq ft	1960

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
402.001	AMCD01	AM95	Separator	77 gal	1976
402.001	AMCD01	AM96	Vacuum Jets		pre-1978
402.001	AMCD01	AM97	Heat Exchanger	100 sq ft	1995
CONTROL DEVICES					
402.001		AMCD01	Flare		1976
AE.001		AMCD02	Flare		
402.003		AMCD03	Internal Floating Roof Tank	2.5 MM gal	2006

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
432.002	None	DMAC01	Tank	25,300 gal	1960; RIK 2021
402.001	AMCD01	DMAC02	Reactor	1380 gal	1960
402.001	AMCD01	DMAC03	Heat Exchanger	247 sq ft	1960
402.001	AMCD01	DMAC04	Heat Exchanger	444 sq ft	1960
402.001	AMCD01	DMAC05	Column	d=3' h=55'	1960; RIK 2020
402.001	AMCD01	DMAC06	Heat Exchanger	555 sq ft	1960
402.001	AMCD01	DMAC07	Heat Exchanger	660 sq ft	1999
402.001	AMCD01	DMAC08	Tank	198 gal	1937
402.001	AMCD01	DMAC09	Column	d=3.5' h=48'	2000
402.001	AMCD01	DMAC10	Heat Exchanger	25 sq ft	1998
402.001	AMCD01	DMAC11	Heat Exchanger	555 sq ft	1990
402.001	AMCD01	DMAC12	Heat Exchanger	804 sq ft	2002
402.001	AMCD01	DMAC13	Vacuum Jet	15 pph air, 1pph organic	1960
402.001	AMCD01	DMAC14	Knockout Pots	d=16" h=2'	1960
432.002	None	DMAC15	Tank	20,000 gal	1960
432.002	None	DMAC16	Tank	10,000 gal	pre-1961
432.002	None	DMAC17	Tank	51,000 gal	1963
432.002	None	DMAC18	Tank	51,000 gal	1960
432.002	None	DMAC19	Tank	51,000 gal	1960
432.003	None	DMAC20	Filter	30 sq ft	1997 RIK
432.003	None	DMAC21	Product Loading		pre-1960
402.001	None	DMAC22	Heat Exchanger	108 sq ft	1960
CONTROL DEVICES					
402.001		AMCD01	Flare	0.8 MMBTU/hr	1976

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as
insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/ Modified
421.004	None	DMF01	Tank	2200 gal	1959; RIK 2018
402.001	AMCD01	DMF02	Reactor	1980 gal	1981
402.001	AMCD01	DMF03	Heat Exchanger	123 sq ft	2013
402.001	AMCD01	DMF04	Heat Exchanger	590 sq ft	2014
402.001	AMCD01	DMF05	Heat Exchanger	576 sq ft	2000
402.001	AMCD01	DMF06	Heat Exchanger	576 sq ft	1988
402.001	AMCD01	DMF07	Heat Exchanger	576 sq ft	1969
402.001	AMCD01	DMF08	Tank	2000 gal	orig 1963 RIK 1988
402.001	AMCD01	DMF09	Heat Exchanger	250 sq ft	1993
402.001	AMCD01	DMF10	Filter	100 gpm	1979
402.001	None	DMF11	Tank	300 gal	1976
402.001	AMCD01	DMF12	Tank	19 cu ft	1976
402.001	AMCD01	DMF13	Tank	10,000 gal	1963
402.001	AMCD01	DMF14	Heat Exchanger	193 sq ft	1982
402.001	AMCD01	DMF15	Distillation Column	d=36" h=67'	1963
402.001	AMCD01	DMF16	Heat Exchanger	42 sq ft	1983
402.001	AMCD01	DMF17	Heat Exchanger	559 sq ft	2012
402.001	AMCD01	DMF18	Heat Exchanger	721 sq ft	1998; RIK 2021
402.001	AMCD01	DMF19	Heat Exchanger	25 sq ft	1999; RIK 2021
402.001	AMCD01	DMF20	Distillation Column	d=42" h=73'	1963
402.001	AMCD01	DMF21	Heat Exchanger	1200 sq ft	2012
402.001	AMCD01	DMF22	Heat Exchanger	796 sq ft	2014
402.001	AMCD01	DMF23	Demister Pad	d=4' h=11"	1960

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
402.001	AMCD01	DMF24	Heat Exchanger	142 sq ft	1960
402.001	AMCD01 None	DMF25	Heat Exchanger	108 sq ft	1960
421.004	None	DMF26	Tank	500 gal	1969
421.004	None	DMF27	Filter		1985
421.004	None	DMF28	Tank	100,000 gal	1935
421.004	None	DMF29	Tank	51,138 gal	2014
421.004	None	DMF30	Tank		pre-1978
421.004	None	DMF31	Tank		OOS
421.004	AMCD01	DMF32	Tank	51,138 gal	2014
421.004	None	DMF33	Tank		OOS
421.004	None	DMF34	Tank	15,400 gal	1976
421.004	None	DMF35	Tank	15,400 gal	1977
421.004	None	DMF36	Tank	50,000 gal	OOS
421.004	None	DMF37	Tank	51,138 gal	2014
421.004	None	DMF38	Tank		OOS
421.004	None	DMF39	Tank		OOS
421.004	None	DMF40	Tank	100,000 gal	1977
421.004	None	DMF41	Tank	100,000 gal	1977
421.004	None	DMF42	Loading Racks		pre-1960
421.004	None	DMF43	Loading Racks		pre-1960
CONTROL DEVICES					
402.001		AMCD01	Flare	0.8 MMBTU/hr	1976

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

Attachment E

REDACTED COPY – CLAIM OF CONFIDENTIALITY

Attachment G

REDACTED COPY – CLAIM OF CONFIDENTIALITY

Confidential Information

Company Name	Belle Chemical Company	Responsible Official		
Company Address	901 W. Dupont Ave.	Confidential Information Designee in State of WV	Name	Alicha Hunt
	Belle, WV 25015		Title	Operations Manager
			Address	901 W. Dupont Ave.
Person/Title Submitting Confidential Information	Michael Hodge Process Compliance Coordinator			Belle, WV 25015
		Phone	(304) 513 - 0202	
		Fax		

Reason for Submittal of Confidential Information:

Title V Renewal Application

Identification of Confidential Information	Rationale for Confidential Claim	Confidential Treatment Time Period
<ul style="list-style-type: none"> - Equipment design and capacity information - Process flow diagrams - Site Maps 	<p>a. Belle Chemical Company continues to claim business confidentiality protection for the Methylamines business. The claim has not expired by its term, or been waved or withdrawn. The confidential information should continue to be maintained as such as indefinite time period. See attached b-e.</p>	Permanent

Responsible Official Signature:	<i>Alicha Hunt</i>
Responsible Official Title:	<i>Operations Manager</i>
Date Signed:	<i>8/12/21</i>

NOTE: Must be signed and dated in **BLUE INK**.

Rationale for Confidentiality Claim

b. Information claimed confidential is not available to the general public. Within the company, Belle Chemical Company has distributed technical information on a need-to-know basis and has used its business confidentiality policy to prevent inadvertent dissemination of information. This policy includes:

- Marking of business confidential documents,
- Limited distribution of documents,
- Shredding of confidential documents before disposal.

Employees are aware of the competitive nature of their business and are trained in guarding confidential information. Within Belle Chemical Company, a corporate program – “PIP” (Proprietary Information Protection) – is used to raise awareness for handling and disclosure of confidential information.

c. Information revealing the process technology in this submittal is not reasonably obtainable by persons other than Belle Chemical Company employees who need to know. To maintain the confidentiality of such information, Belle Chemical Company employees involved with confidential information sign a confidentiality agreement as stipulated by Belle Chemical Company Legal. Transmittal of confidential information is done by certified mail or is delivered in person by a Belle Chemical Company employee.

d. There is no statute that has been reviewed that requires disclosure of information claimed to be confidential.

e. Belle Chemical Company claims business confidentiality protection for the information submitted since disclosure would allow competent engineers within a competitor’s company to determine the manner or process by which Belle Chemical Company produces this product and would provide competitors information without paying for technology or conducting research and development necessary to obtain the technology.