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Return Receipt Request

**The Chemours Company FC, LLC**  
901 W DuPont Avenue  
Belle, WV 25015



**Belle Plant**

William Durham, Director  
WV DEP DAQ  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304



October 1, 2018

Re: Chemours Belle Title V Permit Renewal Application 039-00001 Group 3 of 5

Dear Director:

Please find attached the required information for the permit renewal for the site's group 3 of 5 Title V permit. If you have any questions, please contact me at 304-357-1319 or [Michelle.L.Young@Chemours.com](mailto:Michelle.L.Young@Chemours.com).

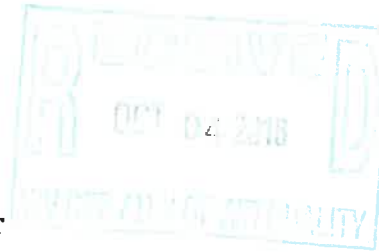
Sincerely

  
Michelle L. Young, M.S., C.H.M.M  
Environmental Consultant

Attachments

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# Permit Application & CBI Cover Letter



**WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION**

**DIVISION OF AIR QUALITY**

601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: (304) 926-0475  
[www.dep.wv.gov/daq](http://www.dep.wv.gov/daq)

**INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS**

**Section 1: General Information**

<b>1. Name of Applicant (As registered with the WV Secretary of State's Office):</b> The Chemours Company FC, LLC	<b>2. Facility Name or Location:</b> The Chemours Company FC, LLC 901 W. DuPont Avenue Belle, WV 25015
<b>3. DAQ Plant ID No.:</b>  0 3 9 — 0 0 0 0 1	<b>4. Federal Employer ID No. (FEIN):</b>  9 1 1 0 7 7 7 3
<b>5. Permit Application Type:</b>  <input type="checkbox"/> Initial Permit <input checked="" type="checkbox"/> Permit Renewal <input type="checkbox"/> Update to Initial/Renewal Permit Application  When did operations commence? 05/DD/1925 What is the expiration date of the existing permit? 04/08/2019	
<b>6. Type of Business Entity:</b>  <input type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Governmental Agency <input type="checkbox"/> Limited Partnership <input checked="" type="checkbox"/> LLC	<b>7. Is the Applicant the:</b>  <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Operator <input type="checkbox"/> Both  If the Applicant is not both the owner and operator, please provide the name and address of the other party. <u>Lucite International Inc.</u> <u>7275 Goodlett Farms Parkway</u> <u>Cordova, TN 38016</u>
<b>8. Number of onsite employees:</b>  239	
<b>9. Governmental Code:</b>  <input checked="" type="checkbox"/> Privately owned and operated; 0 <input type="checkbox"/> Federally owned and operated; 1 <input type="checkbox"/> State government owned and operated; 2 <input type="checkbox"/> County government owned and operated; 3 <input type="checkbox"/> Municipality government owned and operated; 4 <input type="checkbox"/> District government owned and operated; 5	
<b>10. Business Confidentiality Claims</b>  Does this application include confidential information (per 45CSR31)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  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.	

<b>11. Mailing Address</b>		
Street or P.O. Box: 901 W. DuPont Avenue		
City: Belle	State: WV	Zip: 25015-
Telephone Number: (304) 357-1000	Fax Number: (304) 357-1230	

<b>12. Facility Location</b>		
Street: 901 W. DuPont Avenue	City: Belle	County: Kanawha
UTM Easting: ###.## km	UTM Northing: #,###.## km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
Directions: I-64 to Route 60 to DuPont Avenue		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, for what air pollutants?	
Is facility located within 50 miles of another state? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, name the affected state(s).	
Is facility located within 100 km of a Class I Area <sup>1</sup> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, name the area(s).	
If no, do emissions impact a Class I Area <sup>1</sup> ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<sup>1</sup> 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.		

<b>13. Contact Information</b>		
<b>Responsible Official:</b> Timothy L. Byrd		<b>Title:</b> Plant Manager
<b>Street or P.O. Box:</b> 901 W. DuPont Avenue		
<b>City:</b> Belle	<b>State:</b> WV	<b>Zip:</b> 25015-
<b>Telephone Number:</b> (304) 357-1200	<b>Fax Number:</b> (304) 357-1230	
<b>E-mail address:</b> timothy.L.byrd-1@chemours.com		
<b>Environmental Contact:</b> Michelle Young		<b>Title:</b> Environmental Consultant
<b>Street or P.O. Box:</b> 901 W. DuPont Avenue		
<b>City:</b> Belle	<b>State:</b> WV	<b>Zip:</b> 25015-
<b>Telephone Number:</b> (304) 357-1319	<b>Fax Number:</b> (304) 357-1230	
<b>E-mail address:</b> Michelle.L.Young@chemours.com		
<b>Application Preparer:</b> Michelle Young		<b>Title:</b> Environmental Consultant
<b>Company:</b> The Chemours Company FC, LLC		
<b>Street or P.O. Box:</b> 901 W. DuPont Avenue		
<b>City:</b> Belle	<b>State:</b> WV	<b>Zip:</b> 25015-
<b>Telephone Number:</b> (304) 357-1319	<b>Fax Number:</b> (304) 357-1230	
<b>E-mail address:</b> Michelle.L.Young@chemours.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
Chemicals	Methylmaines, VAZO, Glycolic Acid, miscellaneous organic intermediates	325199	2869
Acrylics	plastic monomers	325211	2821

**Provide a general description of operations.**

The Belle Plant manufactures various organic chemicals. This renewal application is for group 1 of 5 which includes the wastewater treatment plant, powerhouse, diesel engines for firewater pumps and gasoline tank.

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 type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input 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 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 <sub>x</sub> Annual Trading Program (45CSR39)	<input checked="" type="checkbox"/> CAIR NO <sub>x</sub> Ozone Season Trading Program (45CSR40)
<input type="checkbox"/> CAIR SO <sub>2</sub> Trading Program (45CSR41)	

## 19. Non Applicability Determinations

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.

☐ 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.**

☐ 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).

See permit

☐ 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 permit

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 current permit

☐ 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 current permit

**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>
CA-03-2010-2031DA	03/18/2010	
R13-1002	02/03/2005	
R13-1628	07/17/2007	
R13-2742	04/01/2008	
CO-R21-97-31	09/06/1997	
CO-R21-C-2001-10A(97)	04/01/2001	
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## 22. Inactive Permits/Obsolete Permit Conditions

[illegible]

**Section 3: Facility-Wide Emissions**

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	0
Nitrogen Oxides (NO <sub>x</sub> )	0
Lead (Pb)	0
Particulate Matter (PM <sub>2.5</sub> ) <sup>1</sup>	0
Particulate Matter (PM <sub>10</sub> ) <sup>1</sup>	0
Total Particulate Matter (TSP)	0
Sulfur Dioxide (SO <sub>2</sub> )	0
Volatile Organic Compounds (VOC)	33
Hazardous Air Pollutants <sup>2</sup>	Potential Emissions
Methanol	9
Methyl Methacrylate	3
Regulated Pollutants other than Criteria and HAP	Potential Emissions
R-134a	Leaks only
R-22	leaks only

<sup>1</sup>PM<sub>2.5</sub> and PM<sub>10</sub> are components of TSP.

<sup>2</sup>For 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 checked="" 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 checked="" type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input checked="" type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO <sub>2</sub> 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 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 checked="" 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 checked="" type="checkbox"/>	19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO <sub>x</sub> , SO <sub>2</sub> , 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 checked="" type="checkbox"/>	<p>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.</p> <p>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:</p>
<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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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 checked="" 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**

<b>25. Equipment Table</b>
Fill out the <b>Title V Equipment Table</b> and provide it as <b>ATTACHMENT D</b> .
<b>26. Emission Units</b>
For each emission unit listed in the <b>Title V Equipment Table</b> , fill out and provide an <b>Emission Unit Form</b> as <b>ATTACHMENT E</b> .
For each emission unit not in compliance with an applicable requirement, fill out a <b>Schedule of Compliance Form</b> as <b>ATTACHMENT F</b> .
<b>27. Control Devices</b>
For each control device listed in the <b>Title V Equipment Table</b> , fill out and provide an <b>Air Pollution Control Device Form</b> as <b>ATTACHMENT G</b> .
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 <b>Compliance Assurance Monitoring (CAM) Form(s)</b> for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as <b>ATTACHMENT H</b> .

## 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: Timothy L. Byrd

Title: Plant Manager

#### Responsible official's signature:

Signature: 

Signature Date: 9/27/2018

(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) - N/A          |
| <input checked="" type="checkbox"/> | ATTACHMENT G: Air Pollution Control Device Form(s) - N/A    |
| <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](http://www.dep.wv.gov/daq), requested by phone (304) 926-0475, and/or obtained through the mail.**

## Cover Document for Confidential Information

<b>Company Name</b>	The Chemours Company FC, LLC	<b>Responsible Official</b>	
<b>Company Address</b>	901 W. DuPont Ave.	<b>Confidential Information Designee in State of WV</b>	<b>Name</b>
	Belle, WV 25015		<b>Title</b>
			<b>Address</b>
<b>Person/Title Submitting Confidential Information</b>	Michelle Young		
	Environmental Coordinator		<b>Phone</b>
			<b>Fax</b>
			Timothy L. Byrd
			Plant Manager
			901 West DuPont Ave.
			Belle, WV 25015
			304-357-1200
			304-357-1204

<b>Reason for Submittal Of Confidential Information :</b> Title V permit renewal application contains process diagrams, descriptions and capacity information

Identification of Confidential Information	Rationale for Confidential Claim 45CSR31-4.1a-e	Confidential Treatment Time Period
<ul style="list-style-type: none"> <li>Att. B Plot Plan</li> <li>Att. C Process Description &amp; Flow Diagrams</li> <li>Capacity information in Attachments D &amp; E (Equipment Table and Data Sheets)</li> </ul>	<p>a. Chemours continues to claim business confidentiality protection for this business. The claim has not expired by its term, or been waived or withdrawn. The confidential information should continue to be maintained as such for an indefinite time period.</p> <p>See attached for b-e</p>	Permanent

<b>Responsible Official Signature:</b>	
<b>Responsible Official Title:</b>	Plant Manager
<b>Date Signed:</b> 9/27/2018	

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

## **Rationale for Confidentiality Claim (Cont.)**

- b. Information claimed confidential is not available to the general public. Within the company, DuPont 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 DuPont, a corporate program – “PIP” (Proprietary Information Protection) – is used to raise awareness for handling and disclosure of confidential information, which is documented in, document number GS-10346, “Guidelines for Safe Guarding DuPont Company Documents and Information”.

- c. Information revealing the process technology in this submittal is not reasonably obtainable by persons other than DuPont employees who need to know. To maintain the confidentiality of such information, DuPont employees involved with confidential information sign a confidentiality agreement as stipulated by DuPont Legal. Transmittal of confidential information is done by certified mail or is delivered in person by a DuPont employee.
- d. There is no statute that has been reviewed that requires disclosure of information claimed to be confidential.
- e. DuPont 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 DuPont produces this product and would provide competitors information without paying for technology or conducting research and development necessary to obtain the technology.