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MEMORANDUM

To: Beverly McKeone, NSR Program Manager
From: Ed Andrews, Engineer 
Date: April 7, 2015
Subject: Memo regarding PD15-03 for The Chemours Company Belle – 039-00001

On January 14, 2015, DuPont (The Chemours Company – new owner) filed a permit determination request for replacing 36 Tank at the Glycolic Acid Process (GA007). 36 Tank is used to store Glycolic Acid from the Glycolic Acid Process at the Belle Plant.

The proposed new 36 Tank will have a storage capacity of 19,000 gallons (72 cubic meters). Thus the vessel is not subject to New Source Performance Standards (Part 60) of Subpart Kb since the tank has a storage capacity of less than 75 cubic meters.

The Glycolic Process meets the criteria under 40 CFR §63.2550. The Glycolic Acid Process is classified as 2869 Industrial Organic Chemicals under the SIC code. Glycolic Acid is manufactured from formaldehyde, which is classified as an organic HAP. The process is not subject to another subpart under Part 63. Thus, the process is an affected source under Subpart FFFF (Miscellaneous Organic Chemical Manufacturing MACT) of Part 63.

Under §63.2550 (Definitions of Storage Vessels), storage tank means a tank that is used to store liquids that contain organic HAP and that has been assigned to a miscellaneous chemical process unit (MCPU). Vessels containing organic liquids that contain HAP(s) only as impurities are not considered storage tanks under this subpart. The liquid stored in 36 Tank is glycolic acid in aqueous solution with traces of formic acid (HAP). The Chemours Company believes that the concentration of formic acid in this liquid would be 0.2%. Therefore, 36 Tank would not be classified as a storage vessel under Subpart FFFF.

Chemours estimated the VOC emissions from 36 Tank to be 1 pound per year with the maximum hourly rate to be 0.20 pounds per hour. The potential for hazardous air pollutants from 36 Tank is the same as the VOC potential with the VOC and HAP being formic acid. The potential from 36 Tank is less than the modification level threshold under 45 CSR 13. Thus, the writer recommends that a no permit needed letter be issued for this permit determination.