



west virginia department of environmental protection

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MEMORANDUM

To: Beverly McKeone, NSR Program Manager
From: Ed Andrews, Engineer
Date: April 8, 2015 
Subject: Memo regarding PD15-024 for Praxair Belle – 039-00059

On March 6, 2015, Praxair Inc. filed a permit determination request for installing a standpipe to vent the discharge side of the cooling water. Praxair's CO Plant is permitted under R13-0891A. DuPont, the site owner and Praxair's customer, is restoring the cooling water capacity to a level that would allow Praxair to operate the CO Plant up to the permitted capacity as permitted in Permit R13-0891A.

Praxair has determined that if the heat exchanger for the syngas compressors does fail that hydrogen gas and carbon monoxide gas would accumulate in the cooling water discharge header at the facility. To reduce the accumulation of these gases in the event of a leaking exchanger, Praxair proposed to install a stand pipe (vent) for this cooling water discharge to the atmosphere. Praxair will monitor this stand pipe and the open cooling water discharge hub for CO using MSA CO monitors, which would indicate that the heat exchanger(s) is leaking.

Permit R13-0891A limits the potential emissions of CO below Title V major source levels. This limit on CO corresponds to daily and annual limits on production. Therefore, no review is necessary for increasing the capacity of the cooling water under PSD or the Title V program. The writer does not consider this proposed stand pipe as a physical change to an existing process that is permitted under 45 CSR 13. Therefore, this proposed stand pipe does not meet the definition of modification as stated under 45 CSR §13-2.17. Thus, the writer recommends that a no permit needed letter be issued for this permit determination.