

Memo to File

To: Bev McKeone
From: Mike Egnor
Date: April 18, 2016
Re: PD 16-025 • Chemours • Belle Plant • 039-00001

This office received a permit determination request for R13-2284A from Chemours April 8, 2016 and dated March 28, 2016. The determination request is to add a new 30,000 gallon pressure storage tank (AM98) in order to store ammonia (NH₃) while the existing ammonia storage tank (AM79) is emptied, cleaned, and inspected. This process is expected to take approximately four months. Additionally, the #7 Dimethyl Amine Tank (AM55) has been removed from service.

The existing ammonia storage tank (AM79) vents to Flare (AMCD02). The pressure storage tank (AM98) is completely enclosed and will not vent to atmosphere.

There will be no increase in emissions as a result of the change in storage of ammonia from storage tank (AM79) to pressurized storage tank (AM98). Additionally, since ammonia is not a HAP, there will be no LDAR requirements. Also, 40CFR60 Subpart Kb does not apply as 40CFR§60.110b(b)(2) states that this subpart does not apply to pressure vessels designed to operate in excess of 204.9 kPa and without emissions to the atmosphere. Storage tank (AM98) has a normal operating pressure of 1,278 kPa and does not have emissions to the atmosphere.

Evaluation Comments:

It is recommended that the facility add this tank to the equipment list upon their next Group 5 of 5 Title V Permit renewal.