

 <p>WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION  <b>DIVISION OF AIR QUALITY</b>          601 57<sup>th</sup> Street, SE          Charleston, WV 25304          (304) 926-0475  <a href="http://www.dep.wv.gov/daq">www.dep.wv.gov/daq</a></p>	<p><b>APPLICATION FOR NSR PERMIT</b>  <b>AND</b>  <b>TITLE V PERMIT REVISION</b>  <b>(OPTIONAL)</b></p>
<p>PLEASE CHECK ALL THAT APPLY TO <b>NSR (45CSR13)</b> (IF KNOWN):</p> <p><input type="checkbox"/> CONSTRUCTION    <input type="checkbox"/> MODIFICATION    <input type="checkbox"/> RELOCATION  <input type="checkbox"/> CLASS I ADMINISTRATIVE UPDATE    <input type="checkbox"/> TEMPORARY  <input checked="" type="checkbox"/> CLASS II ADMINISTRATIVE UPDATE    <input checked="" type="checkbox"/> AFTER-THE-FACT</p>	<p>PLEASE CHECK TYPE OF <b>45CSR30 (TITLE V)</b> REVISION (IF ANY):</p> <p><input type="checkbox"/> ADMINISTRATIVE AMENDMENT    <input checked="" type="checkbox"/> MINOR MODIFICATION  <input type="checkbox"/> SIGNIFICANT MODIFICATION</p> <p>IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS <b>ATTACHMENT S</b> TO THIS APPLICATION</p>
<p><b>FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.</b></p>	
<p><b>Section I. General</b></p>	
<p>1. Name of applicant (as registered with the WV Secretary of State's Office):          The Chemours Company FC, LLC</p>	<p>2. Federal Employer ID No. (<b>FEIN</b>):          46-5626518</p>
<p>3. Name of facility (if different from above):          Washington Works Facility</p>	<p>4. The applicant is the:  <input type="checkbox"/> OWNER    <input type="checkbox"/> OPERATOR    <input checked="" type="checkbox"/> BOTH</p>
<p>5A. Applicant's mailing address:          Building 1, Washington Works          Washington WV, 26181-1217</p>	<p>5B. Facility's present physical address:          8480 DuPont Road          Washington, WV 26181</p>
<p>6. <b>West Virginia Business Registration.</b> Is the applicant a resident of the State of West Virginia?    <input checked="" type="checkbox"/> YES    <input type="checkbox"/> NO</p> <p>– If <b>YES</b>, provide a copy of the <b>Certificate of Incorporation/Organization/Limited Partnership</b> (one page) including any name change amendments or other Business Registration Certificate as <b>Attachment A</b>.</p> <p>– If <b>NO</b>, provide a copy of the <b>Certificate of Authority/Authority of L.L.C./Registration</b> (one page) including any name change amendments or other Business Certificate as <b>Attachment A</b>.</p>	
<p>7. If applicant is a subsidiary corporation, please provide the name of parent corporation:</p>	
<p>8. Does the applicant own, lease, have an option to buy or otherwise have control of the <i>proposed site</i>?    <input checked="" type="checkbox"/> YES    <input type="checkbox"/> NO</p> <p>– If <b>YES</b>, please explain:        Owns site</p> <p>– If <b>NO</b>, you are not eligible for a permit for this source.</p>	
<p>9. Type of plant or facility (stationary source) to be <b>constructed, modified, relocated, administratively updated</b> or <b>temporarily permitted</b> (e.g., coal preparation plant, primary crusher, etc.): Chemical Manufacturing</p>	<p>10. North American Industry Classification System (<b>NAICS</b>) code for the facility:          325199</p>
<p>11A. DAQ Plant ID No. (for existing facilities only):          107-00182</p>	<p>11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):          R13-1353G, R13-3223, R30-107-00182 Segment 2 of 14</p>
<p><b>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</b></p>	

12A.

- For **Modifications, Administrative Updates** or **Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction** or **Relocation permits**, please provide directions to the *proposed new site location* from the nearest state road. Include a **MAP** as **Attachment B**.

Take the Route 50 bypass towards Ohio from I-77. Exit the Route 50 bypass at the last exit in West Virginia. At the light turn left and continue on DuPont road for approximately ½ - ¾ mile. The main plant entrance will be visible on your right.

12.B. New site address (if applicable):

N/A

12C. Nearest city or town:

Parkersburg

12D. County:

Wood

12.E. UTM Northing (KM): 4346.8

12F. UTM Easting (KM): 442.3

12G. UTM Zone: 17

13. Briefly describe the proposed change(s) at the facility:

This permit amendment is for including VOC emissions in the amounts of 0.1 lbs/hr, 0.14 tpy from T5HGE. This was requested previously, but never included in the permit. Also, since sources T5HK and T5HL no longer handle a regulated air pollutant, we request removing references to them and their condenser (T5HKC) and emission point (T5HKE) from the permit.

14A. Provide the date of anticipated installation or change:

- If this is an **After-The-Fact** permit application, provide the date upon which the proposed change did happen: 2007

14B. Date of anticipated Start-Up if a permit is granted:

14C. Provide a **Schedule** of the planned **Installation of/Change** to and **Start-Up** of each of the units proposed in this permit application as **Attachment C** (if more than one unit is involved).

15. Provide maximum projected **Operating Schedule** of activity/activities outlined in this application:

Hours Per Day 24      Days Per Week 7      Weeks Per Year 52

16. Is demolition or physical renovation at an existing facility involved?     YES     NO

17. **Risk Management Plans.** If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see [www.epa.gov/ceppo](http://www.epa.gov/ceppo)), submit your **Risk Management Plan (RMP)** to U. S. EPA Region III.

18. **Regulatory Discussion.** List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (*if known*). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (*if known*). Provide this information as **Attachment D**.

## **Section II. Additional attachments and supporting documents.**

19. Include a check payable to WVDEP – Division of Air Quality with the appropriate **application fee** (per 45CSR22 and 45CSR13).

20. Include a **Table of Contents** as the first page of your application package.

21. Provide a **Plot Plan**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as **Attachment E** (Refer to **Plot Plan Guidance**).

– Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).

22. Provide a **Detailed Process Flow Diagram(s)** showing each proposed or modified emissions unit, emission point and control device as **Attachment F**.

23. Provide a **Process Description** as **Attachment G**.

– Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).

**All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.**

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.

– For chemical processes, provide a MSDS for each compound emitted to the air.

25. Fill out the **Emission Units Table** and provide it as **Attachment I**.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Bulk Liquid Transfer Operations | <input type="checkbox"/> Haul Road Emissions     | <input type="checkbox"/> Quarry  |
| <input checked="" type="checkbox"/> Chemical Processes   | <input type="checkbox"/> Hot Mix Asphalt Plant   | <input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities |
| <input type="checkbox"/> Concrete Batch Plant            | <input type="checkbox"/> Incinerator             | <input type="checkbox"/> Storage Tanks   |
| <input type="checkbox"/> Grey Iron and Steel Foundry     | <input type="checkbox"/> Indirect Heat Exchanger |  |
| <input type="checkbox"/> General Emission Unit, specify  |  |  |

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Absorption Systems        | <input type="checkbox"/> Baghouse                   | <input type="checkbox"/> Flare                 |
| <input type="checkbox"/> Adsorption Systems        | <input type="checkbox"/> Condenser                  | <input type="checkbox"/> Mechanical Collector  |
| <input type="checkbox"/> Afterburner               | <input type="checkbox"/> Electrostatic Precipitator | <input type="checkbox"/> Wet Collecting System |
| <input type="checkbox"/> Other Collectors, specify |   |  |

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**.

➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

**YES**       **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 found in the **General Instructions** as **Attachment Q**.

### Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

- Authority of Corporation or Other Business Entity                       Authority of Partnership  
 Authority of Governmental Agency                                       Authority of Limited Partnership

Submit completed and signed **Authority Form** as **Attachment R**.

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

**Certification of Truth, Accuracy, and Completeness**

I, the undersigned  **Responsible Official** /  **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

**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.

SIGNATURE \_\_\_\_\_ DATE: \_\_\_\_\_  
(Please use blue ink) (Please use blue ink)

35B. Printed name of signee: Robert J. Fehrenbacher

35C. Title: Plant Manager

35D. E-mail:  
robert.j.fehrenbacher@chemours.com

36E. Phone: 304-863-4305

36F. FAX: 304-863-4962

36A. Printed name of contact person (if different from above): David F. Altman

36B. Title: Sr. Env. Control Consult.

36C. E-mail: david.f.altman@chemours.com

36D. Phone: 304-863-4271

36E. FAX: 304-863-4862

**PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Attachment A: Business Certificate               | <input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet            |
| <input checked="" type="checkbox"/> Attachment B: Map(s)                             | <input checked="" type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s)          |
| <input type="checkbox"/> Attachment C: Installation and Start Up Schedule            | <input type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s)            |
| <input checked="" type="checkbox"/> Attachment D: Regulatory Discussion              | <input checked="" type="checkbox"/> Attachment N: Supporting Emissions Calculations     |
| <input checked="" type="checkbox"/> Attachment E: Plot Plan                          | <input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input checked="" type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s)   | <input checked="" type="checkbox"/> Attachment P: Public Notice                         |
| <input checked="" type="checkbox"/> Attachment G: Process Description                | <input checked="" type="checkbox"/> Attachment Q: Business Confidential Claims          |
| <input checked="" type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS) | <input type="checkbox"/> Attachment R: Authority Forms                                  |
| <input checked="" type="checkbox"/> Attachment I: Emission Units Table               | <input checked="" type="checkbox"/> Attachment S: Title V Permit Revision Information   |
| <input checked="" type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input checked="" type="checkbox"/> Application Fee                                     |

*Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.*

**FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:**

- Forward 1 copy of the application to the Title V Permitting Group and:*
- For Title V Administrative Amendments:*
  - NSR permit writer should notify Title V permit writer of draft permit,*
- For Title V Minor Modifications:*
  - Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,*
  - NSR permit writer should notify Title V permit writer of draft permit.*
- For Title V Significant Modifications processed in parallel with NSR Permit revision:*
  - NSR permit writer should notify a Title V permit writer of draft permit,*
  - Public notice should reference both 45CSR13 and Title V permits,*
  - EPA has 45 day review period of a draft permit.*

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

## Attachment A

### Business Certificate

**WEST VIRGINIA  
STATE TAX DEPARTMENT  
BUSINESS REGISTRATION  
CERTIFICATE**

ISSUED TO:  
**THE CHEMOURS COMPANY FC, LLC  
8480 DUPONT RD  
WASHINGTON, WV 26181-8398**

**BUSINESS REGISTRATION ACCOUNT NUMBER: 2303-3963**

This certificate is issued on: **10/27/2014**

*This certificate is issued by  
the West Virginia State Tax Commissioner  
in accordance with Chapter 11, Article 12, of the West Virginia Code*

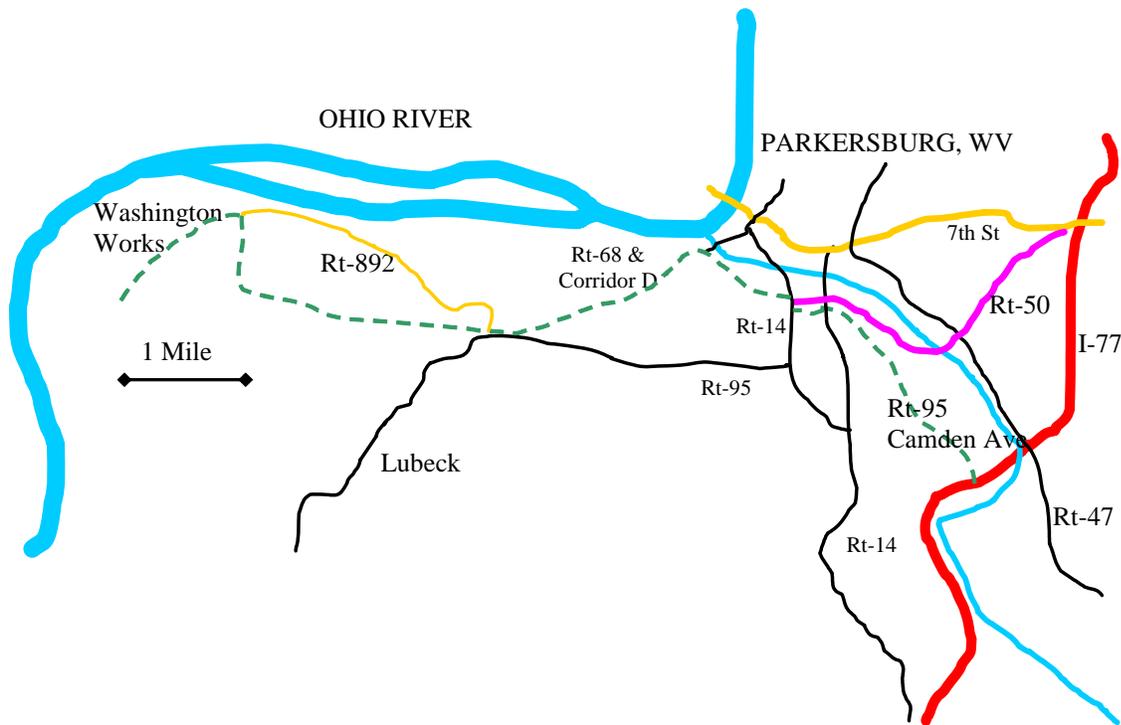
*The person or organization identified on this certificate is registered  
to conduct business in the State of West Virginia at the location above.*

This certificate is not transferrable and must be displayed at the location for which issued  
This certificate shall be permanent until cessation of the business for which the certificate of registration  
was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new  
certificate shall be required.

TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.  
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of  
this certificate displayed at every job site within West Virginia.

## ATTACHMENT B – Map to Facility



From Interstate 77, take exit for Rt-95/Camden Avenue.  
Proceed West until intersection with Rt-14 then turn right (north).  
After about 1/4 mile turn left onto Corridor D Bypass entrance.  
Follow the bypass to the exit just before the bridge  
Turn left (south) onto DuPont Rd, Rt-892.  
Proceed approx. 1 mile to facility on right.

## Attachment D

### Regulatory Discussion

This process area is covered by the following state regulations:

1. 45CSR4
2. 45CSR7
3. 45CSR13
4. 45CSR21
5. 45CSR29
6. 45CSR30

This process area operation is currently covered by permit R13-1353F and R13-3223.

#### RACT

45CSR21-40.3.c requires RACT analysis on a case by case basis for those VOC emissions greater than 6 pph which are constructed, modified, or begin operation after the date 45CSR 21 becomes effective. Permit R13-3223 requires RACT analysis for any increase in VOC from sources listed in R13-3223. Source T5HG, for which we are requesting an increase in VOC emissions is not on the R13-3223 list, nor are we requesting an increase in emissions above the 6 pph limit.

This class II permit amendment application is being filed under 45CSR13 since a slight increase in VOC emissions is being requested. Additionally, other lesser requests are being made to clean up permit R13-2365F prior to submitting a Title V permit renewal application for R30-10700182, including proposed permit language changes, which are included with this application.

#### PSD

As of January 2, 2011, pursuant to actions taken by the USEPA, Greenhouse Gases (GHGs) became a regulated pollutant under the major NSR program. As such, an evaluation must be done for any increase in GHG emissions resulting from construction or modification to determine PSD applicability per 40 CFR 52.21. There are no new emissions of components listed in table A-1 of 40 CFR 98.2 therefore PSD for GHG does not apply.

#### **The changes proposed in this Class II Administrative update R13-1353G include:**

1. To establish VOC emission limits within the permit for source T5HG. Within application R13-1353E, submitted on November 9, 2012, DuPont previously requested VOC limits of 0.06 pph and 0.15 tpy VOCs from source T5HG at emission point T5HGE. These limits were never transcribed into R13-1353, nor into R30-10700001. This Class II Permit Amendment application is intended, in part, to address this. Emission calculations for this source only, are included in Attachment N of this application.
2. A request to remove T5HK and T5HL from the existing permits, as sources of ODCs. Sources T5HK and T5HL previously handled an ozone-depleting compound (ODC), however, EPA phased out the use of the compound for process use, therefore, the compound was replaced with a material not classified as a regulated air pollutant. Notification of this replacement was made to WV DEP, who in turn issued permit determination PD14-007 on January 30, 2014. As a result of this change, Chemours seeks to remove from the permit references to sources T5HK and T5HL, and their associated condenser (T5HKC) and emission point (T5HKE). Removing these sources will cause a decrease in the amount of ODC potentially emitted to atmosphere by 0.5 pph, 1.97 tpy from emission point T5HKE; and in the amounts of 0.2 pph and 0.30 tpy from emission point T5HIE.

As a result, Chemours requests that the following conditions be changed in the permit:

- 1) Remove emission point T5HKE from Table A.1, with associated data.
- 2) Remove references to ODC and associated limits from emission point T5HIE.
- 3) Remove permit conditions A.9. and A.10. and Table A.10. from the permit.
- 4) Remove permit condition B.8. from the permit.

3. Remove references to Consent Order CO-R21-97-47 in permit condition B.7. on page 8, replacing with references to permit R13-3223.

**4. 45 CSR 7 – Compliance condition modification request – Condition B.3.:**

In the current permit the requirement for monitoring for particulate matter, found in permit condition B.3 which requires **“Monitoring shall be conducted at least once per month with a maximum of forty-five (45) days between consecutive readings”**. Chemours has experienced a significant issue with the interpretation of the condition such that we consistently perform the observations as required. The additional text that sets the 45 day maximum interval has been seen, despite educational efforts, to mean that there is up to a 45 day period after the last reading to take the next reading. Chemours is requesting that the compliance condition be simplified to require a monthly visual observation for visible particulate emissions. The elimination of the perceived conflicting 45 day period will enable Chemours personnel to ensure the readings are performed at the correct interval and that focus can be given to the Operations personnel to ensure the reading is always taken early in the operational month before production schedule or challenges alter the operational timing and cause a missed reading. The suggested limited text change from above is to **“Monitoring shall be conducted at least once per month.”**

The proposed changes described above are summarized in the following table:

Permit No.	Condition No.	Description of Proposed Permit Change
R13-1353F	Table A.1.	For emission point T5HGE, include VOC emission limits of 0.1 pph and 0.14 tpy.
		Remove emission point T5HKE, with associated sources, control device, pollutant and emission limits since sources T5HK and T5HL no longer handle a regulated air pollutant.
		Remove ODC as an air pollutant emitted from emission point T5HIE, since the origin of the ODC was from sources T5HK and T5HL, which no longer handle the ODC.
R13-1353F	A.9., A.10. and Table A.10.	Remove these conditions and table, since they reference sources T5HK and T5HL, control device T5HKC and emission point T5HKE, which no longer handle a regulated air pollutant.
R13-1353F	B.3.	Revise the second sentence to say, “Monitoring shall be conducted at least once per month.”
R13-1353F	B.7., page 8	Remove references to consent order CO-R21-97-47, replacing with permit R13-3223.
R13-1353F	B.8.	Remove this condition from the permit, as it is associated with source T5HK and control device T5HKC, which no longer handle a regulated air pollutant.



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west virginia department of environmental protection

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

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

January 30, 2014

Karl Boelter  
DuPont  
P.O. Box 1217  
Washington, WV 26181-1217

RE: Permit Applicability Determination  
E.I. duPont de Nemours and Company  
Washington Works  
Determination No. PD14-007  
Plant ID No. 107-00001

Dear Mr. Boelter:

It has been determined that a permit will not be required under 45CSR13 for your proposed replacement of the SUVA® - 123 with Vertrel® XF specialty fluid as the processing aid for the production of Fluoropolymers in the T5 area of DuPont Washington Works facility. This determination is based on information included with your permit determination form dated January 22, 2014 and received on January 23, 2014, which indicates that the increase in emissions will not exceed two (2) lbs/hr OR five (5) tons/year of total Hazardous Air Pollutants (HAPs); six (6) lbs/hour AND ten (10) TPY of any regulated pollutant; or, trigger a substantive requirement 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. 1217 or [Laura.M.Jennings@wv.gov](mailto:Laura.M.Jennings@wv.gov).

Sincerely,

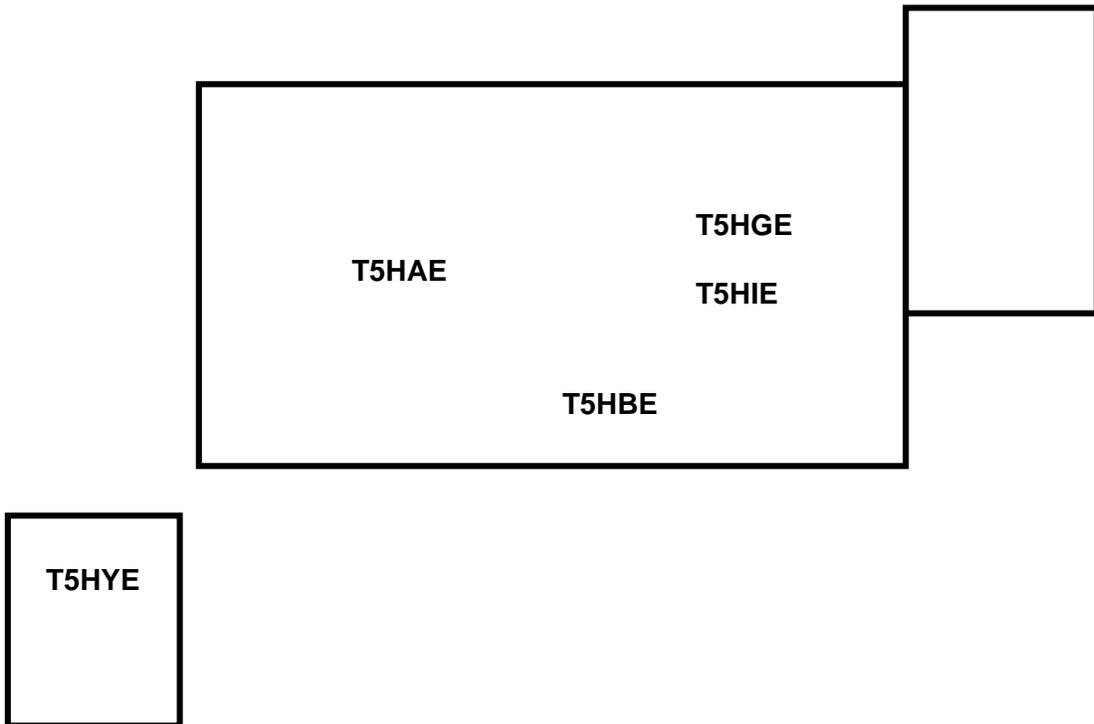
Laura Jennings  
Permit Engineer

## Attachment E

### Plot Plan

**T5 Area Plot Plan**

**Bldg. 164**



# T5 Area Plot Plan (cont.)

**Bldg. 162**



<b>T5HTE</b>	<b>T5HUE</b>	<b>T5HVE</b>			<b>T5HDE</b> <b>T5HDE2</b>	<b>T5HCE</b> <b>T5HCE2</b>
					<b>T5HXE</b> <b>T5RAE</b>	<b>T5HWE</b> <b>T5RAE</b>

**T5HNE – In  
shed, west of  
barricade  
area**

## Attachment F

### Detailed Process Flow Diagrams



## Attachment G

### Process Description

The T5 area produces fluoropolymer resin. The basic processes used are polymerization, drying, and modification. The resin is produced by water based emulsion polymerization in one of two reactor units. Water, monomer (primarily tetrafluoroethylene), process aids, and other minor ingredients are introduced to the reactor. The reaction starts under elevated pressure, but proceeds to an endpoint at sub-ambient pressure. The resin is removed as slurry and is stored in one of several tanks pending further treatment and drying.

The polymer slurry is processed and dried. The wet polymer passes through one of two dryers. Emissions from either dryer pass through cyclone separators to recover particulate matter. Both cyclone systems employ a water spray to improve effectiveness. The material recovered from the cyclones is returned to the process. Dried resin is transferred to a pack-out room where it is drummed using automated equipment.

Line #2 contains an additional processing step. The added material used in this process is not VOC, nor is it an ozone-depleting compound. This material is recovered within the system. The treated polymer is then dried using the Line #2 dryer.

In preparation for renewing Title V permit R30-10700182, Part 2, Chemours has applied for a Class II permit amendment to make necessary changes to permit R13-1353F.

## Attachment H

### MSDS Sheets



The MSDS format adheres to the standards and regulatory requirements of the United States and may not meet regulatory requirements in other countries.

DuPont Page 1
Material Safety Data Sheet

E0000077 E1 Stable Fluid Revised 31-AUG-2007

CHEMICAL PRODUCT/COMPANY IDENTIFICATION

Material Identification

Corporate MSDS Number : DU002725
CAS Number : 3330-15-2

Company Identification

MANUFACTURER/DISTRIBUTOR
DuPont
Fluoroproducts
1007 Market Street
Wilmington, DE 19898

PHONE NUMBERS

Product Information : 1-(800)441-7515
Transport Emergency : 1-(800)424-9300
Medical Emergency : 1-(800)441-3637

COMPOSITION/INFORMATION ON INGREDIENTS

# Components

Table with 3 columns: Material, CAS Number, %. Row 1: PROPANE, 1,1,1,2,2,3,3-HEPTAFLUORO-3-(1,2,2,2-TETRAFLUOROETHOXY)-, 3330-15-2, 100

Components (Remarks)

Material is not known to contain Toxic Chemicals under Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR part 372.

HAZARDS IDENTIFICATION

Potential Health Effects

INHALATION

Freon\ E-1 Based on animal data, repeated or excessive overexposure may cause the following effects: Central nervous system depression with dizziness, confusion, incoordination, drowsiness or unconsciousness. Central nervous system stimulation with increased activity or sleeplessness. Tremors. Convulsions.

E0000077

DuPont  
Material Safety Data Sheet

Page 2

## (HAZARDS IDENTIFICATION - Continued)

Other effects include: Irregular heart beat with a strange sensation in the chest, "heart thumping", apprehension, lightheadedness, feeling of fainting, dizziness, weakness, sometimes progressing to loss of consciousness and death. Suffocation, if air is displaced by vapors.

## SKIN CONTACT

Freon\ E-1 Based on animal data, this material may cause: Slight irritation with itching, redness or swelling.

## ADDITIONAL HEALTH EFFECTS

Freon\ E-1 Increased susceptibility to the effects of this material may be observed in persons with pre-existing disease of the: central nervous system, cardiovascular system.

## Carcinogenicity Information

None of the components present in this material at concentrations equal to or greater than 0.1% are listed by IARC, NTP, OSHA or ACGIH as a carcinogen.

-----  
FIRST AID MEASURES  
-----

## First Aid

## INHALATION

If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Call a physician.

## SKIN CONTACT

In case of contact, immediately flush skin with plenty of water for at least 15 minutes, while removing contaminated clothing and shoes. Call a physician. Wash contaminated clothing before reuse.

## EYE CONTACT

In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Call a physician.

## INGESTION

If swallowed, immediately give 2 glasses of water and induce vomiting. Never give anything by mouth to an unconscious person. Call a physician.

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(FIRST AID MEASURES - Continued)

## Notes to Physicians

THIS MATERIAL MAY MAKE THE HEART MORE SUSCEPTIBLE TO ARRHYTHMIAS. Catecholamines such as adrenaline, and other compounds having similar effects, should be reserved for emergencies and then used only with special caution.

-----  
FIRE FIGHTING MEASURES  
-----

## Flammable Properties

Non-flammable. Will not burn without external flame. Hazardous gases/vapors produced in fire are toxic or irritating hydrogen fluoride, toxic or highly toxic fluorides.

## Extinguishing Media

Water, Foam, Dry Chemical, CO2.

## Fire Fighting Instructions

Keep personnel removed and upwind of fire. Wear self-contained breathing apparatus. Wear full protective equipment. Cool tank/container with water spray.

-----  
ACCIDENTAL RELEASE MEASURES  
-----

## Safeguards (Personnel)

NOTE: Review FIRE FIGHTING MEASURES and HANDLING (PERSONNEL) sections before proceeding with clean-up. Use appropriate PERSONAL PROTECTIVE EQUIPMENT during clean-up.

Evacuate personnel, thoroughly ventilate area, use self-contained breathing apparatus.

## Initial Containment

Remove source of heat, sparks, flame, impact, friction or electricity. Dike spill.

## Spill Clean Up

Recover undamaged and minimally contaminated material for reuse and reclamation. Soak up with sawdust, sand, oil dry or other absorbent material. Shovel, vacuum or scoop up to a metal drum for disposal. Transfer spilled material and absorbent to metal drums for disposal.

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-----  
HANDLING AND STORAGE  
-----

## # Handling (Personnel)

Avoid contact with eyes, skin, or clothing. Avoid prolonged breathing or repeated contact with skin. Wash contaminated clothing prior to reuse.

See FIRST AID and PERSONAL PROTECTIVE EQUIPMENT SECTIONS.

## Handling (Physical Aspects)

Keep away from heat, sparks and flames. Keep container tightly closed.

## Storage

Store in a clean, dry place.

-----  
EXPOSURE CONTROLS/PERSONAL PROTECTION  
-----

## Engineering Controls

Use sufficient ventilation to keep employee exposure below recommended limits.

## # Personal Protective Equipment

**EYE/FACE PROTECTION:** Wear coverall chemical splash goggles. Additionally, wear a face shield where the possibility exists for face contact due to splashing or spraying of material.

**RESPIRATOR:** Where there is potential for airborne exposures in excess of applicable limits, wear NIOSH approved respiratory protection.

**PROTECTIVE CLOTHING:** Where there is potential for skin contact have available and wear as appropriate impervious gloves, apron, pants, jacket, hood and boots.

## Exposure Guidelines

## Exposure Limits

E1 Stable Fluid  
AEL \* (DuPont) : 500 ppm, 8 & 12 Hr. TWA

\* AEL is DuPont's Acceptable Exposure Limit. Where governmentally imposed occupational exposure limits which are lower than the AEL are in effect, such limits shall take precedence.

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-----  
PHYSICAL AND CHEMICAL PROPERTIES  
-----

## Physical Data

Boiling Point : 41 C (106 F)  
Vapor Pressure : 8 psia @ 25 C (77 F)  
Solubility in Water : <25 ppm  
Odor : No Distinct Odor  
Form : Liquid  
Color : Clear, Colorless  
Density : 1.54 g/mL 13 lb/gal  
Viscosity : 0.5 cp  
Pour Point : -155 C (-247 F)

-----  
STABILITY AND REACTIVITY  
-----

## Chemical Stability

Stable at 500 F (260 C) . Hazardous decomposition may occur above 500 F (260 C). Hazardous gases or vapors can be released, including toxic or irritating hydrogen fluoride, toxic or highly toxic fluorides.

Chemically inert and thermally stable below 500 deg F (260 deg C).

## Incompatibility with Other Materials

Incompatible or can react with oxidizers: chlorine.

## Polymerization

Polymerization will not occur.

-----  
TOXICOLOGICAL INFORMATION  
-----

## # Animal Data

PROPANE,1,1,1,2,2,3,3-HEPTAFLUORO-3- (1,2,2,2-TETRAFLUOROETHOXY)-

## SKIN:

ALD, rabbit: > 37,500 mg/kg.  
Single exposure to high doses caused: Increased respiratory rates.  
Constricted pupils. Redness of skin.

## INGESTION:

ALD, rat: > 25,000 mg/kg.

## INHALATION:

4 hour, ALC, rat: > 576,000 ppm.

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## (TOXICOLOGICAL INFORMATION - Continued)

Single exposure to high doses caused: Tremors or convulsions. Cardiac sensitization, a potentially fatal disturbance of heart rhythm associated with a heightened sensitivity to the action of epinephrine. Lowest-Observed-Adverse-Effect-Level for cardiac sensitization: 200,000 ppm. Repeated exposure caused: Decreased response to sound. Tremors. No-Observed-Adverse-Effect-Level (NOAEL): 25,000 ppm

## CARCINOGENIC, DEVELOPMENTAL, REPRODUCTIVE, MUTAGENIC EFFECTS:

Tests have shown that this material does not cause genetic damage in bacterial or mammalian cell cultures, or in animals. No animal data are available to define the following effects of this material: carcinogenicity, developmental toxicity, reproductive toxicity.

-----  
ECOLOGICAL INFORMATION  
-----

## Ecotoxicological Information

No information is available.

-----  
DISPOSAL CONSIDERATIONS  
-----

## Waste Disposal

Preferred options for disposal are: (1) Separate solids from liquid by precipitation and decanting or filtering. Dispose of dry solids in a landfill that is permitted, licensed or registered by a state to manage industrial solid waste. Discharge liquid filtrate to a wastewater treatment system. (2) Incinerate only if incinerator is capable of scrubbing out hydrogen fluoride and other acidic combustion products. Treatment, storage, transportation, and disposal must be in accordance with applicable federal, state/provincial, and local regulations.

-----  
TRANSPORTATION INFORMATION  
-----

## Shipping Information

DOT  
Proper Shipping Name : NOT REGULATED

## Shipping Containers

Steel Drums.

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Material Safety Data Sheet

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-----  
REGULATORY INFORMATION  
-----

## U.S. Federal Regulations

TSCA Inventory Status : In compliance with TSCA Inventory requirements for commercial purposes.

## TITLE III HAZARD CLASSIFICATIONS SECTIONS 311, 312

Acute : Yes  
Chronic : Yes  
Fire : No  
Reactivity : No  
Pressure : No

## State Regulations (U.S.)

## STATE RIGHT-TO-KNOW LAWS

No substances on the state hazardous substances list, for the states indicated below, are used in the manufacture of products on this Material Safety Data Sheet.

SUBSTANCES ON THE PENNSYLVANIA HAZARDOUS SUBSTANCES LIST PRESENT AT A CONCENTRATION OF 1% OR MORE (0.01% FOR SPECIAL HAZARDOUS SUBSTANCES): None known.

WARNING: SUBSTANCES KNOWN TO THE STATE OF CALIFORNIA TO CAUSE CANCER, BIRTH DEFECTS OR OTHER REPRODUCTIVE HARM: None known.

SUBSTANCES ON THE NEW JERSEY WORKPLACE HAZARDOUS SUBSTANCE LIST PRESENT AT A CONCENTRATION OF 1 % OR MORE (0.1% FOR SUBSTANCES IDENTIFIED AS CARCINOGENS, MUTAGENS OR TERATOGENS): None known.

-----  
OTHER INFORMATION  
-----

## Additional Information

MEDICAL USE: CAUTION: Do not use in medical applications involving permanent implantation in the human body. For other medical applications see DuPont CAUTION Bulletin No. H-50102.

-----  
The data in this Material Safety Data Sheet relates only to the specific material designated herein and does not relate to use in combination with any other material or in any process.

Responsibility for MSDS : L. W. BUXTON  
Address : DUPONT FLUOROPOLYMERS  
CHESTNUT RUN PLAZA 713  
WILMINGTON, DE 19880-0713  
Telephone : 302-999-4658

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Material Safety Data Sheet

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(Continued)

# Indicates updated section.

This information is based upon technical information believed to be reliable. It is subject to revision as additional knowledge and experience is gained.

End of MSDS

Attachment I  
Equipment List Form

## Equipment List Form - T5 Area 1353G

Type Change, if any (New, Modification, or Removal)	Date of Change	Emissions Unit (Source)		Air Pollution Control Device		Emission Point	
		ID No.	Source	ID No.	Device Type	ID No.	Emission Type
No Change	N/A	T5HM	Raw Material Tank	None		T6IUE	Upward vertical stack
No Change	N/A	T5HT	#1 Tank	None		T5HTE	Upward vertical stack
No Change	N/A	T5HU	#2 Tank	None		T5HUE	Upward vertical stack
No Change	N/A	T5HV	#3 Tank	None		T5HVE	Upward vertical stack
No Change	N/A	T5HP	Raw Material Tank	None		T5HDE, T5HCE	Upward vertical stack
No Change	N/A	T5HW	#4 Tank	None		T5HCE, T5HWE	Upward vertical stack
No Change	N/A	T5HX	#5 Tank	None		T5HDE, T5HXE	Upward vertical stack
No Change	N/A	T5HN	Raw Material Tank	None		Area, T5HCE	Upward vertical stack
No Change	N/A	T5HC	4X Polykettle	None		Area, T5HCE, T5HCE2	Upward vertical stack
No Change	N/A	T5HD	5X Polykettle	None		Area, T5HDE, T5HDE2	Upward vertical stack
No Change	N/A	T5HA	#1 Heater	None		T5HAE	Upward vertical stack
No Change	N/A	T5HB	#2 Heater	None		T5HBE	Upward vertical stack
Modification	1Q 2013	T5HG	#1 Dryer	T5HGC	Cyclone	T5HGE	Upward vertical stack
Modification	1/1/2015	T5HI	#2 Dryer	T5HIC	Cyclone	T5HIE	Upward vertical stack
Remove	1/1/2015	T5HK	Process Tank	T5HKC	Condenser	T5HKE	Upward vertical stack
Remove	1/1/2015	T5HL	Process Tank	T5HKC	Condenser	T5HKE	Upward vertical stack
No Change	N/A	T5HY	Chiller	None		T5HYE	Downward vertical stack

## Attachment J Emission Points Data Summary Sheets

Attachment J - Emission Point Data Sheet (1353G Revision)

Emission point ID No. (Must match Equipment List Form and Plot plan)	Source(s) Vented Through This Point <sup>1</sup> (Must match Equipment List Form and Plot plan)		Air Pollution Control Device (Must match Equipment List Form and Plot plan)		Vent Time for Source (Chemical Processors Only)		All Regulated Pollutants <sup>2</sup>		Maximum Potential: Uncontrolled Emissions <sup>3a</sup>		Maximum Potential: Controlled Emissions <sup>3a</sup>		Emission Form or Phase (At exit conditions, Solid, Liquid, or Gas/Vapor)	Est. Method Used <sup>4</sup>	Emission Concentration <sup>5</sup> (PPMv or Mg/L <sup>3</sup> )	Exit Gas			Emission Point Elevation		UTM Coordinates (m)	
	ID No.	SOURCE NAME	ID No.	Device Type	Short Term (estimated)	Max (Hr/Yr)	Chemical Name/CAS <sup>2</sup>	Lb/Hr	Ton/Yr	Lb/Hr	Ton/Yr	Temp. (F)				Volumetric flow (actm)	Velocity (fps)	Level	Height <sup>6</sup>	Northing	Easting	
							(Specify HAPs)															
T5HTE	T5HT	#1 Tank	None		4x/yr	4	ODC VOC	0.200 27.400	0.010 0.060	0.200 27.400	0.010 0.060	Gas Gas	EE EE	202 969776	0.05	-22	72	571.5	630	55	4346772	441974
T5HUE	T5HU	#2 Tank	None		4x/yr	4	Non-Regulated ODC VOC	0.060 0.200 27.400	0.010 0.010 0.060	0.060 0.200 27.400	0.010 0.010 0.060	Gas Gas Gas	EE EE EE	215 202 969776	0.05	-22	72	571.5	630	55	4346772	441974
T5HVE	T5HV	#3 Tank	None		4x/yr	4	Non-Regulated ODC VOC	0.060 0.200 27.400	0.010 0.010 0.060	0.060 0.200 27.400	0.010 0.010 0.060	Gas Gas Gas	EE EE EE	215 202 969776	0.05	-22	72	571.5	630	55	4346772	441974
T5HWE	T5HW	#4 Tank	None		4x/yr	4	Non-Regulated ODC VOC	0.060 0.200 27.400	0.010 0.010 0.060	0.060 0.200 27.400	0.010 0.010 0.060	Gas Gas Gas	EE EE EE	215 202 969776	0.05	-30	72	571.5	630	50	4346772	441974
T5HXE	T5HX	#5 Tank	None		4x/yr	4	Non-Regulated ODC VOC	0.060 0.200 27.400	0.010 0.010 0.060	0.060 0.200 27.400	0.010 0.010 0.060	Gas Gas Gas	EE EE EE	215 202 969776	0.05	-30	72	571.5	630	50	4346772	441974
Area	T5HN	Raw Material Tank	None		15x/yr	15	VOC Acetonitrile	2.180 0.001	0.007 0.000	2.180 0.001	0.007 0.000	Gas Gas	EE EE	N/A N/A	N/A	50	N/A	N/A	630	6	4346772	441974
Area	T5HC T5HD	4X Polykettle 5X Polykettle	None		10min/hr 10min/hr	8760 8760	ODC VOC	0.100 1.740	0.020 7.140	0.100 1.740	0.020 7.140	Gas Gas	EE EE	N/A N/A	N/A	122	N/A	N/A	630	50	4346772	441974
T5HCE	T5HC T5HN T5HW T5HP	4X Polykettle Raw Material Tank #4 Tank Raw Material Tank	None		10min/hr	8760	Non-Regulated ODC VOC Acetonitrile	0.070 0.780 17.100 0.001	0.010 0.150 3.300 0.001	0.070 0.780 17.100 0.001	0.010 0.150 3.300 0.001	Gas Gas Gas Gas	EE EE EE EE	N/A 3 23221 Trace 94	0.17	122	77	56.7	630	50	4346772	441974
T5HCE2	T5HC	4X Polykettle	None		160x/yr	900	Non-Regulated ODC VOC Acetonitrile	1.900 0.700 152.000 0.001	0.080 0.010 1.330 0.001	1.900 0.700 152.000 0.001	0.080 0.010 1.330 0.001	Gas Gas Gas Gas	EE EE EE EE	202 1000000 Trace 6604	0.08	122	12	37.5	630	50	4346772	441974
T5HDE	T5HD T5HX T5HP T5HT T5HU T5HV	5X Polykettle #5 Tank Raw Material Tank #1 Tank #2 Tank #3 Tank	None		10min/hr	8760	Non-Regulated ODC VOC Acetonitrile	0.620 0.780 32.300 0.001	0.023 0.150 3.300 0.001	0.620 0.780 32.300 0.001	0.023 0.150 3.300 0.001	Gas Gas Gas Gas	EE EE EE EE	6604 3 44034 Trace 94	0.17	122	77	56.7	630	50	4346772	441974
T5HDE2	T5HD	5X Polykettle	None		160x/yr	900	Non-Regulated ODC VOC Acetonitrile	0.620 0.700 152.000 0.001	0.023 0.010 1.330 0.001	0.620 0.700 152.000 0.001	0.023 0.010 1.330 0.001	Gas Gas Gas Gas	EE EE EE EE	6604 202 1000000 Trace 6604	0.08	122	12	37.5	630	50	4346772	441974
T5HAE	T5HA	#1 Heater	None		Continuous	8760	Non-Regulated Nitrogen Oxides Carbon Monoxide PM (Total,10.2.5) Sulfur Dioxide VOC	0.620 0.400 0.100 0.100 0.100	0.023 1.600 0.150 0.020 0.110	0.620 1.600 0.100 0.100 0.110	0.023 1.600 0.150 0.020 0.110	Gas Gas S Gas Gas	AP-42 AP-42 AP-42 AP-42 AP-42	750 1077 54 3 45	0.67	750	1,675	79	630	75	4346772	441974
T5HBE	T5HB	#2 Heater	None		Continuous	8760	Non-Regulated Nitrogen Oxides Carbon Monoxide PM (Total,10.2.5) Sulfur Dioxide VOC	0.620 0.400 0.100 0.100 0.100	0.023 1.800 1.510 0.140 0.020	0.620 1.800 1.510 0.140 0.020	0.023 1.800 1.510 0.140 0.020	Gas Gas S Gas Gas	AP-42 AP-42 AP-42 AP-42 AP-42	780 1077 54 3 45	0.67	750	1,675	79	630	75	4346772	441974
T5HGE	T5HG	Line 1 Dryer	T5HGC	Cyclone	Continuous	8760	PM PM10 APFO VOC	40.073 1.673 0.073 0.060	99.997 4.127 0.133 0.150	0.500 0.100 0.022 0.060	0.500 0.100 0.022 0.150	S S S Gas	EE EE EE EE	16.36 3.11 0.72 0.15	1.50	123	8,057	75.99	630	63	441928	4346757
T6IJE	T5HM	Refined Monomer System	None		2x/Yr	48	VOC ODC Acetonitrile 107-13-1 Toluene 108-88-3	122.800 0.360 0.010 0.01	12.360 0.490 0.001 0.001	122.800 0.360 0.010 0.01	12.360 0.490 0.001 0.001	Gas Gas Gas Gas	EE EE EE EE	98873 263 8 8	0.167	317	199.5	149.5	646	47	4346772	442000
T5HIE	T5HI	Line 2 Dryer	T5HIC	Cyclone	Continuous	8760	PM PM10 ODC APFO VOC	50.091 2.091 0.406 0.091 0.080	75.436 3.113 0.206 0.100 0.110	0.700 0.200 0.200 0.030 0.110	0.920 0.170 0.200 0.030 0.110	S S Gas S Gas	EE EE EE EE EE	37.47 7.12 2.40 1.66 0.20	0.88	134	4,399	121.9	630	64	441926	4346758
T5HKE	T5HL	Process-Tank	T5HKC	Condenser	10min/hr	4400	ODC	8.027	20.304	0.600	4.070	Gas	EE	324407	0.00	-22	4	2.8	630	66	4346772	441974
T5HYE	T5HY	Chiller System	None		Continuous	8760	Methanol - HAP	0.110	0.780	0.110	0.780	Gas	EE	12637	0.33	32	>1	0.1	630	12	4346772	441974

Attachment J - Emission Point Data Sheet (1353G Revision)

Emission point ID No. (Must match Equipment List Form and Plot plan)	Source(s) Venting Through This Point <sup>1</sup> (Must match Equipment List Form and Plot plan)		Air Pollution Control Device (Must match Equipment List Form and Plot plan)		Vent Time for Source (Chemical Processes Only)		All Regulated Pollutants- Chemical Name/CAS <sup>2</sup> (Speciate HAPS)	Maximum Potential Uncontrolled Emissions <sup>3a</sup>		Maximum Potential Controlled Emissions <sup>3b</sup>		Emission Form or Phase (At exit conditions, Solid, Liquid, or Gas/Vapor)	Est. Method Used <sup>4</sup>	Emission Concentration <sup>5</sup> (PPM/ or Mgm <sup>3</sup> )	Inner Diameter (ft.)	Exit Gas			Emission Point Elevation		UTM Coordinates (m)	
	ID No.	SOURCE NAME	ID No.	Device Type	Short Term (estimated)	Max (Hr/Yr)		Lb/Hr	Ton/Yr	Lb/Hr	Ton/Yr					Temp. (F)	Volumetric flow <sup>6</sup> (actm)	Velocity (fps)	Ground Level	Stack Height <sup>8</sup>	Northing	Easting

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

1 Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).

2 List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS2, VOCs, H2S, Inorganics, Lead, Organics, O3, NO, NO2, SO2, SO3, etc. DO NOT LIST CO2, H2, H2O, N2, O2, and Noble Gases.

3 Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

4 Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

5 Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).

6 For gasses, the units are ppmv. For particulate the units are mg/m<sup>3</sup>.

7 Give at operating conditions. Include inerts.

8 Release height of emissions above ground level.

a The hourly number is the largest of the sources feeding the stack, not the sum. The yearly number reflects the total of all sources.

## Attachment L – Emission Unit Data Sheets

T5HG page 1 of 4

**Attachment L**  
**EMISSIONS UNIT DATA SHEET**  
**GENERAL**

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on *Equipment List Form*):

T5HG

**1. Name or type and model of proposed affected source:**

Dryer venting through T5HGE

**2. On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.**

**3. Name(s) and maximum amount of proposed process material(s) charged per hour:**

CONFIDENTIAL	CONFIDENTIAL	Lb/Hr
CONFIDENTIAL	CONFIDENTIAL	Lb/Hr
CONFIDENTIAL	CONFIDENTIAL	gm

**4. Name(s) and maximum amount of proposed material(s) produced per hour:**

CONFIDENTIAL	CONFIDENTIAL	Lb/Hr
CONFIDENTIAL	CONFIDENTIAL	Lb/Hr
CONFIDENTIAL	CONFIDENTIAL	Lb/Hr

**5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:**

CONFIDENTIAL

\*The identification number which appears here must correspond to the air pollution control device identification number appearing on the *List Form*.

<b>6. Combustion Data (if applicable):</b>					
<b>(a) Type and amount in appropriate units of fuel(s) to be burned:</b>					
N/A					
<b>(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:</b>					
N/A					
<b>(c) Theoretical combustion air requirement (ACF/unit of fuel):</b>					
N/A	@	N/A	°F and	N/A	psia.
<b>(d) Percent excess air:</b>					
N/A					
<b>(e) Type and BTU/hr of burners and all other firing equipment planned to be used:</b>					
<b>(f) If coal is proposed as a source of fuel, identify supplier and seams and give sizing of the coal as it will be fired:</b>					
N/A					
<b>(g) Proposed maximum design heat input:</b>					
			N/A	× 10 <sup>6</sup> BTU/hr.	
<b>7. Projected operating schedule:</b>					
<b>Hours/Day</b>	24	<b>Days/Week</b>	7	<b>Weeks/Year</b>	52

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:					
@		F° and			psia
a	NOX		lb/hr		grains/ACF
b	SO2		lb/hr		grains/ACF
c	CO		lb/hr		grains/ACF
d	PM10	1.673E+00	lb/hr		grains/ACF
e	Hydrocarbons		lb/hr		grains/ACF
f	VOCs	6.000E-02	lb/hr		grains/ACF
g	Pb		lb/hr		grains/ACF
h	Specify Others				
	PM2.5		lb/hr		grains/ACF
	TSP	4.007E+01	lb/hr		grains/ACF
	TotalHAPS		lb/hr		grains/ACF
	ODC		lb/hr		grains/ACF
	APFO		lb/hr		

NOTE:(1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.  
 (2) Complete the Emission Points Data Sheet.

<p>9. Proposed Monitoring, Recordkeeping, Reporting, and Testing with the proposed operating parameters. Please propose testing in order to demonstrate</p>	
<p><b>MONITORING</b></p> <p>The hourly rates are established by engineering calculations whose inputs are the operating variables and equipment in place at the time of the application. To insure the operating variables do not change, a process management system is in place, requiring signoff by a responsible official. The annual emission limits are monitored through the use of a spreadsheet maintained by operations.</p>	<p><b>RECORDKEEPING</b></p> <p>The number of times each event happens each month will be recorded and the resulting monthly emissions of each criteria pollutant class calculated. A twelve-month moving total will be maintained in a spreadsheet by operations. The total will be compared to the limits established.</p>
<p><b>REPORTING</b></p> <p>Reports will be prepared and/or submitted as per the request of the Director, WVDAQ.</p>	<p><b>TESTING</b></p> <p>No testing is planned. Testing will be done as required by permit or as directed by the Director, WVDAQ.</p>
<p><b>MONITORING.</b> Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment operation/air pollution control device.</p>	
<p><b>RECORDKEEPING.</b> Please describe the proposed recordkeeping that will accompany the monitoring.</p>	
<p><b>REPORTING.</b> Please describe the proposed frequency of reporting of the recordkeeping.</p>	
<p><b>TESTING.</b> Please describe any proposed emissions testing for this process equipment/air pollution control device.</p>	
<p>10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty</p>	

**Attachment L  
EMISSIONS UNIT DATA SHEET  
GENERAL**

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on *Equipment List Form*):

T5HI

<b>1. Name or type and model of proposed affected source:</b>		
Dryer venting through T5HIE		
<b>2. On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.</b>		
<b>3. Name(s) and maximum amount of proposed process material(s) charged per hour:</b>		
CONFIDENTIAL	CONFIDENTIAL	Lb/Hr
CONFIDENTIAL	CONFIDENTIAL	Lb/Hr
CONFIDENTIAL	CONFIDENTIAL	gm
<b>4. Name(s) and maximum amount of proposed material(s) produced per hour:</b>		
CONFIDENTIAL	CONFIDENTIAL	Lb/Hr
CONFIDENTIAL	CONFIDENTIAL	Lb/Hr
CONFIDENTIAL	CONFIDENTIAL	Lb/Hr
<b>5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:</b>		
CONFIDENTIAL		

\*The identification number which appears here must correspond to the air pollution control device identification number appearing on the *List Form*.

<b>6. Combustion Data (if applicable):</b>					
<b>(a) Type and amount in appropriate units of fuel(s) to be burned:</b>					
N/A					
<b>(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:</b>					
N/A					
<b>(c) Theoretical combustion air requirement (ACF/unit of fuel):</b>					
N/A	@	N/A	°F and	N/A	psia.
<b>(d) Percent excess air:</b>					
N/A					
<b>(e) Type and BTU/hr of burners and all other firing equipment planned to be used:</b>					
<b>(f) If coal is proposed as a source of fuel, identify supplier and seams and give sizing of the coal as it will be fired:</b>					
N/A					
<b>(g) Proposed maximum design heat input:</b>					
			N/A	× 10 <sup>6</sup> BTU/hr.	
<b>7. Projected operating schedule:</b>					
<b>Hours/Day</b>	24	<b>Days/Week</b>	7	<b>Weeks/Year</b>	52

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:					
@		F° and			psia
a	NOX		lb/hr		grains/ACF
b	SO2		lb/hr		grains/ACF
c	CO		lb/hr		grains/ACF
d	PM10	1.673E+00	lb/hr		grains/ACF
e	Hydrocarbons		lb/hr		grains/ACF
f	VOCs	6.000E-02	lb/hr		grains/ACF
g	Pb		lb/hr		grains/ACF
h	Specify Others				
	PM2.5		lb/hr		grains/ACF
	TSP	4.007E+01	lb/hr		grains/ACF
	TotalHAPS		lb/hr		grains/ACF
	ODC		lb/hr		grains/ACF
	APFO		lb/hr		

NOTE:(1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.

(2) Complete the Emission Points Data Sheet.

<p>9. Proposed Monitoring, Recordkeeping, Reporting, and Testing with the proposed operating parameters. Please propose testing in order to demonstrate</p>	
<p><b>MONITORING</b></p> <p>The hourly rates are established by engineering calculations whose inputs are the operating variables and equipment in place at the time of the application. To insure the operating variables do not change, a process management system is in place, requiring signoff by a responsible official. The annual emission limits are monitored through the use of a spreadsheet maintained by operations.</p>	<p><b>RECORDKEEPING</b></p> <p>The number of times each event happens each month will be recorded and the resulting monthly emissions of each criteria pollutant class calculated. A twelve-month moving total will be maintained in a spreadsheet by operations. The total will be compared to the limits established.</p>
<p><b>REPORTING</b></p> <p>Reports will be prepared and/or submitted as per the request of the Director, WVDAQ.</p>	<p><b>TESTING</b></p> <p>No testing is planned. Testing will be done as required by permit or as directed by the Director, WVDAQ.</p>
<p><b>MONITORING.</b> Please list and describe the process parameters and ranges that are proposed to be monitored in order to demonstrate compliance with the operation of this process equipment operation/air pollution control device.</p>	
<p><b>RECORDKEEPING.</b> Please describe the proposed recordkeeping that will accompany the monitoring.</p>	
<p><b>REPORTING.</b> Please describe the proposed frequency of reporting of the recordkeeping.</p>	
<p><b>TESTING.</b> Please describe any proposed emissions testing for this process equipment/air pollution control device.</p>	
<p>10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty</p>	

## Supporting Emission Calculations

## Example Calculations

1. Ideal gas law –  $P*V=n*R*T$ , solve for n.

P= pressure

V= volume

n= no. of moles

R= universal gas constant

T= temperature

a.  $n*mwt$ = pounds emitted per event with event duration no greater than 1 hour

mwt= molecular weight of the compound(s) emitted.

b.  $n*$ percentage of component\*mwt=pounds emitter per event when dealing with less than 100%

c. Number of events determine annual emissions

Number of batches.

Number of yearly cleanings or outages

2. For non-ideal situations – equation of state – used to determine mole fractions

$$P=R*T/(V-b)-a/(V*(V+b)+b*(V-b))$$

P=pressure

V= molar volume

T= temperature

a is a function of interaction parameters and mole fractions

b is a function of component critical temperatures and pressures.

a. solve for pounds per event as before

b. same as in 1.b.

3. Air measurements to determine pounds per event then times number of events to get annual emissions.

4. Polymer rate times emissions per pound of polymer

a. polymer rate may have a surrogate such as motor amps, screw speed, etc. for

hourly emissions or number of batches for annual emissions.

- b. emissions per pound of polymer are either engineering estimates, determined by off gas analysis, scaling up from a pilot plant or simple stack measurements.

The values presented in the detailed calculation pages were derived from a combination of engineering calculation software (TK Solver) based on the  $PV=nRT$  equation and analytical measurements therefore they differ from the following example due to varying software input values and the addition of the E1 compound generated from the FRD 903/902.

### Example Calculation using $PV=nRT$

Reactors (X1, X2)

#### Description

Polymerization takes place at high temperature and pressure in an aqueous medium. After polymerization is complete, unreacted materials are recycled to the monomer production area for re-use. After the initial vent to recycle or the thermal converter, the reactors contain residual unreacted gas that is vented to atmosphere prior to processing the next batch.

The vent to atmosphere is accomplished by applying vacuum to the reactor head space to reach a nominal pressure of 5.2 psia (-9.5 psig vacuum). Next, the atmospheric vent is closed and N<sub>2</sub> is added to reach ambient pressure. Then the aqueous batch is dropped into a decanter. N<sub>2</sub> is left on during this transfer process, so the net result is that the residual gas in the reactor head space is drawn into the next vessel downstream of the reactor and emitted from this vessel.

For emission determination and allocation, the total amount that is emitted from both the reactor and the next vessel downstream is calculated based on the total amount of gas in the reactor after recycle to monomers (or to thermal converter), and then this total is allocated to reactor vent and decanter (or stabilization tank) vent based on the vacuum pressure setting.

#### Emission Calculations

Emissions from the reactor and associated vessel (decanter or stabilization tank) depend upon the amount and composition of the gas remaining in the reactor head space after venting to the monomers area (or thermal converter), and the head space temperature and pressure.

There are several combinations of cases that must be evaluated in order to determine the maximum potential emissions from these vessels. There are four basic types of polymers made in the reactors; one using only TFE, two others with small amounts of comonomers, and a copolymer (PFA). Each product within the four basic types was evaluated with respect to aqueous phase volume, and the worst case (i.e. highest reactor head space volume) product was used as the basis for emission calculations. Each of the four product types were evaluated for both a pure monomer case and a maximum impurity case. Pure monomer is the worst case for potential VOC emissions, and maximum impurities is the worst case for ODCs and HAPs. Only certain product recipes utilize the FRD903/902 compounds.

A small fraction of batches must be aborted after the initial pressure up phase. Because the aqueous phase is smaller for an aborted batch than for a normal batch, this case becomes the worst case for maximum hourly potential emissions. However, because batches are aborted infrequently, the effect on annual potential emissions is minimal. Pure monomer is the worst case for an aborted batch because the total amount of impurities introduced into the reactor is less for an aborted batch than a batch which is reacted to completion.

### TFE Homopolymer Example

TFE homopolymers are made with either all TFE monomer or with small amounts of additives. The worst case product with respect to VOC emissions will be used in the following examples with both pure TFE monomer and maximum impurities in the TFE monomer feed.

#### A. Pure TFE Monomer

Reaction takes place at a pressure of 365 psia and temperature of 80 C (176 F). Reactor head space is calculated by subtracting the raw dispersion volume from the reactor total volume (810 gal). For the worst case TFE homopolymer, the reactor head space is 30.482 ft<sup>3</sup>.

The first step is to calculate the total number of moles of gas present in the reactor after the reaction is complete. This is done as follows using the Perfect Gas Law with the known T, P, and V after the reaction:

$$\begin{aligned} n &= PV/RT \\ n &= (365)(144)(30.482)/(1545)(460+176) \\ n &= 1.6305 \text{ lb moles} \end{aligned}$$

The calculation above holds for both the pure monomer case and the monomer impurity case. Next, the composition of the gas must be calculated in order to determine the emissions to atmosphere. The composition of the gas depends upon the amount of monomer feed to the reactor, the amount of impurities in the monomer feed streams, the amount of each material reacted, and water vapor pressure. For the pure monomer case, feed rate to the reactor is:

$$\begin{aligned} \text{Mass feed TFE} &= m_{\text{TFE}} = 3090 \text{ lb/batch} \\ \text{Molar feed TFE} &= n_{\text{TFE}} = 3090/100 = 30.90 \text{ lb moles/batch} \end{aligned}$$

For pure TFE monomer, the only other component in the head space is water vapor. The amount of water vapor after reaction is estimated from the perfect gas law:

$$\begin{aligned} n_{\text{water}} &= P_{\text{water}}V/RT \\ n_{\text{water}} &= (6.87)(144)(30.482)/(1545)(460+176) \\ n_{\text{water}} &= 0.03069 \text{ lb moles} \end{aligned}$$

The amount of TFE in the reactor head space after the reaction is determined by subtracting the moles of water vapor from the total moles in the reactor head space before venting to monomers area:

$$n_{\text{TFE}} = 1.6305 - 0.0307 = 1.5998 \text{ lb moles}$$

Emissions to the atmosphere are calculated using the perfect gas law and assuming that water vapor is not replenished during the recycle of unreacted TFE from the reactor to the monomer area. Mole fractions after reaction are:

$$Y_{TFE} = 1.5998/1.6305 = 0.9812$$

$$Y_{H_2O} = 0.0307/1.6305 = 0.0188$$

If water vapor is not replenished, then the mole fractions remain constant during the pressure reduction from 365 psia to 16.7 psia. TFE emissions to the atmosphere are:

$$n_{TFE} = (16.7)(0.9812)(144)(30.482)/[(1545)(460+176)]$$

$$n_{TFE} = 0.0732 \text{ lb mole}$$

Since the molecular weight of TFE is 100, the amount of TFE (VOC) emitted per batch is 7.32 lb. However, since the reactor pressure is only reduced to 5.2 psia during the vacuum step, some of the TFE remains in the reactor head space and is assumed to be drawn into the decanter when the raw aqueous dispersion is dropped from the reactor into the decanter. Total TFE emissions of 7.32 lb/batch are allocated to the reactor and decanter as follows:

$$\text{Reactor emission} = 7.32[(16.7-5.2)/16.7] = 5.04 \text{ lb/batch}$$

$$\text{Decanter emission} = 7.32(5.2/16.7) = 2.28 \text{ lb/batch}$$

Total VOC emissions for this case are 6.26 lb/batch (lb/hr); this is allocated to the reactor and decanter the same way as for the pure TFE monomer case (4.31 lb for the reactor and 1.95 lb for the decanter). Maximum ODC emissions are 0.36 lb from the reactor and 0.16 lb from the decanter. There are no HAP impurities in TFE.

## Attachment P

### Public Notice

## Attachment P – Public Notice

### **AIR QUALITY PERMIT NOTICE Notice of Application**

Notice is given that The Chemours Company FC, LLC, has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Class II Administrative Update for a plastic polymerization facility located on 8480 DuPont Road near Parkersburg in Wood County, West Virginia. The coordinates are: Latitude 39.26862 and Longitude -81.66888.

The applicant estimates the increased potential to discharge the following Regulated Air Pollutants: Volatile Organic Compounds (VOCs): 0.1 lbs/hr and 0.14 tons/year. The applicant estimates a decreased potential to discharge the following Regulated Air Pollutants: Ozone Depleting Compounds (ODCs): 0.7 lbs/hr and 2.27 tons/year.

No physical changes to the existing operations are planned. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57<sup>th</sup> Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

Dated this the **8th** day of May, 2015.

By: The Chemours Company FC, LLC  
Robert J. Fehrenbacher  
Plant Manager  
8480 DuPont Road  
Washington, WV 26181-1217

## Attachment S

### Title V Permit Revision Information

**Attachment S  
Title V Permit Revision Information**

<b>1. New Applicable Requirements Summary</b>	
Mark all applicable requirements associated with the changes involved with this permit revision.	
<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 (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS (Subpart ____)	<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 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) <sup>(1)</sup>
<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program EGUs (45CSR26)
<sup>(1)</sup> If this box is checked, please include <b>Compliance Assurance Monitoring (CAM) Form(s)*</b> for each Pollutants Specific Emission Unit (PSEU).	

<b>2. Non Applicability Determinations</b>
List all requirements, which the source has determined to be not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and the rationale for the determination.
 The proposed changes do not trigger any new applicable requirements nor do they invalidate any previous non-applicability determinations.
<b>Permit Shield</b>
<input type="checkbox"/> Permit Shield is Requested ( <i>not applicable to Minor Modifications</i> )

<b>3. Change in Potential Emissions</b>		
<b>Pollutant</b>	<b>Change in Potential Emissions (+ or -), lb/hr</b>	<b>Change in Potential Emissions (+ or -), TPY</b>
VOC	+ 0.1	+ 0.14
ODC	-0.7	-2.27

<b>4. List other Active NSR Permits / Permit Determinations / Consent Orders associated with this permit revision (if any):</b>		
<b>NSR Permit and/or Consent Order Number</b>	<b>Date of Issuance</b>	<b>NSR Permit / Consent Order Condition Number</b>
R13-1353F	4/4/2014	Tables A.1. and A.10.; conditions A.9., A.10, B.3., B.7. and B.8.
R30-10700182-2010	12/8/2014	Table 8.1.1.; conditions 8.1.7., 8.1.8., 8.1.15, 8.2.1.8.2.3., 8.4.8. and 8.5.1.5.

<b>5. Inactive Permits / Obsolete Permit or Obsolete Consent Order(s) Conditions Associated With This Permit Revision</b>		
<b>NSR Permit and/or Consent Order Number</b>	<b>Date of Issuance</b>	<b>NSR Permit / Consent Order Condition Number</b>

<b>6. Suggested Title V Draft Permit Language</b>
<p>Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes, describe the changes below. Also, please provide suggested Title V Draft Permit language for these changes (including all applicable requirements and any monitoring /recordkeeping/ reporting requirements associated with the changes), or attach a marked up pages of current Title V Permit. Please include appropriate citations for those requirements being added / revised.</p> <p>Proposed changes are listed in the attached table. The portion outside the scope of this NSR permit revision are references to 40 CFR 63 Subpart DDDDD, otherwise known as the Federal Boiler and Process Heater MACT.</p>

R30-10700182	Table 8.1.1.	For emission point T5HGE, include VOC emission limits of 0.1 pph and 0.14 tpy.
		Remove emission point T5HKE, with associated sources, control device, pollutant and emission limits since sources T5HK and T5HL no longer handle a regulated air pollutant.
		Remove ODC as an air pollutant emitted from emission point T5HIE, since the origin of the ODC was from sources T5HK and T5HL, which no longer handle the ODC.
R30-10700182	8.1.7., 8.1.8. and Table 8.1.8.	Remove these conditions and table, since they reference sources T5HK and T5HL, control device T5HKC and emission point T5HKE, which no longer handle a regulated air pollutant.
R30-10700182	8.1.15.	This section is proposed to be added to include requirements of 40 CFR 63 Subpart DDDDD (Boiler and Process Heater MACT), which applies to sources T5HA and T5HB. Compliance with this MACT is required by 1/31/2016.
R30-10700182	8.2.1.	Request that the second sentence be revised to state: "Monitoring shall be conducted at least once per month."
R30-10700182	8.2.3.	Remove this condition from the permit, as it is associated with source T5HK and control device T5HKC, which no longer handle a regulated air pollutant.
R30-10700182	8.4.8.	This section is proposed to be added to include recordkeeping requirements of 40 CFR 63 Subpart DDDDD (Boiler and Process Heater MACT), which applies to sources T5HA and T5HB. Compliance with this MACT is required by 1/31/2016.
R30-10700182	8.5.1.5.	This section is proposed to be added to include reporting requirements of 40 CFR 63 Subpart DDDDD (Boiler and Process Heater MACT), which applies to sources T5HA and T5HB. Compliance with this MACT is required by 1/31/2016.

**7. Certification For Use Of Minor Modification Procedures** *(for Minor Modifications only)**Note:*

*This certification must be signed by a responsible official. Minor Modification applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:*

- i. Proposed changes do not violate any applicable requirement;
- ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;
- iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;
- v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;
- vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 6.5.a.1.A. of 45CSR30 (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under this rule.

**Pursuant to Section 6.5.a.2.C of 45CSR30, the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 6.5.a.1. The use of Minor permit modification procedures are hereby requested for processing of this application.**

(Signed):

\_\_\_\_\_

*(Please use blue ink)*

Date:

\_\_\_\_/\_\_\_\_/\_\_\_\_

*(Please use blue ink)*

Named  
(typed):

Robert J. Fehrenbacher

Title:

Plant Manager

**NOTE:**

**(1) For Administrative Amendments, the ability to operate with the changes described in this permit application is granted upon submittal of the application.**

**(2) For Minor Modifications, the ability to operate with the changes described in this permit application is granted after seven (7) days from the submittal of the application, or upon issuance of the NSR permit, whichever is later.**

**(3) For Significant Modifications, the ability to operate is granted upon issuance of the modified Title V permit.**

\* All of the required forms and additional information can be found and downloaded from DAQ's Permitting Section site [www.wvdep.org/daq](http://www.wvdep.org/daq), requested by phone (304) 926-0475, and/or obtained through the mail.