E. I. du Pont de Nemours and Company
Washington Works
Mail: P.O. Box 2800
Washington, WV 26181-2800

May 18, 2016

CERTIFIED MAIL – 7007 1490 0001 6676 7210
RETURN RECEIPT REQUESTED

Mr. W. Fred Durham, Director
Division of Air Quality
WV Department of Environmental Protection
601 57th Street, SE
Charleston, WV 25304-2345

Permit Determination for the Installation of a Replacement Control Device [S293-C-03B] in the Specialty Compounding Area at DuPont Washington Works

Dear Mr. Durham:

Attached you will find the Permit Determination forms for the assessment of permitting requirements for the installation of a replacement particulate control device in the Specialty Compounding Area on extrusion line "B" at Washington Works.

This permit determination covers the replacement of high efficiency dry paper filter particulate control system with a recirculating wet scrubber system for the treatment of the extrusion die vent. The change in the control device is to enhance operability of the line but will not be a modification as defined by 45 CSR 13 Section 2.17 because the control device is as efficient as the previous unit and the change does not result in an increase in regulated emissions, an increase in production rate or a change in emissions due to the introduction of a new regulated pollutant into the extrusion line. A new Air Pollution Control Device (APCD) form has been attached for the new unit and an update for the emission point description form (Attachment J) has also been attached.

Attachment S has been completed and submitted with this request for a Permit Determination to allow update of the facility Title V Permit.

If you have questions or concerns with this permit application, please contact Mr. Chris E. Shoop by telephone at (304) 863-2133 or Mr. Philip T. Smith at (304) 863-2896 or by email at philip1.smith@dupont.com.

Sincerely,

Charles R. Hill
SHE Manager
DuPont Washington Works

CRH: pts/kdf
Enclosures

Copy: Carrie McCumbers
Division of Air Quality
WV Department of Environmental Protection
601 57th Street, SE
Charleston, WV 25304-2345

Mike Egnor, Permitting
Division of Air Quality
WV Department of Environmental Protection
601 57th Street, SE
Charleston, WV 25304-2345

E. I. du Pont de Nemours and Company
Shipping: 8480 DuPont Rd – Bldg 24
Washington, WV 26181

WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street, SE
Charleston, WV 25304
Phone: (304) 926-0475
www.wvdep.org

PERMIT DETERMINATION FORM (PDF)

FOR AGENCY USE ONLY: PLANT I.D. # _____

PDF # _____ PERMIT WRITER _____

1. NAME OF APPLICANT (AS REGISTERED WITH THE WV SECRETARY OF STATE'S OFFICE):
E. I. du Pont de Nemours and Company,

2. NAME OF FACILITY (IF DIFFERENT FROM ABOVE):
Washington Works

3. NORTH AMERICAN INDUSTRY CLASSIFICATION SYSTEM (**NAICS**) CODE:
3 2 5 2 1 1

4A. MAILING ADDRESS:
DuPont Washington Works
P.O. Box 2800
Washington WV 26181-1217

4B. PHYSICAL ADDRESS:
DuPont Washington Works
8480 DuPont Road, Building 24
Washington WV 26181

5A. DIRECTIONS TO FACILITY (PLEASE PROVIDE **MAP** AS **ATTACHMENT A**): See Map - From Charleston take I-77 north to the Route 50. Turn West on to Route 50 and use the bypass around Parkersburg. At the DuPont Road Exit - exit and at DuPont Road turn Left. The plant is approximately ¼ - ½ mile on the right side.

5B. NEAREST ROAD:	5C. NEAREST CITY OR TOWN:	5D. COUNTY:
DuPont Road	Parkersburg	Wood
5E. UTM NORTHING (KM):	**5F. UTM EASTING (KM):**	**5G. UTM ZONE:**
4346.8331	442.3767	17

6A. INDIVIDUAL TO CONTACT IF MORE INFORMATION IS REQUIRED:
Charles R. Hill

6B. TITLE:
SHE Manager

6C. TELEPHONE:	6D. FAX:	6E. E-MAIL:
(304) 863-2202	(304) 863-4190	Charles-R.F.Hill-1@dupont.com

7A. DAQ PLANT I.D. NO. (FOR AN EXISTING FACILITY ONLY):
107 - 00001

7B. PLEASE LIST ALL CURRENT 45CSR13, 45CSR14, 45CSR19 AND/OR TITLE V (45CSR30) PERMIT NUMBERS ASSOCIATED WITH **THIS** PROCESS (FOR AN EXISTING FACILITY ONLY):
R30-10700001 Part 8 of 14

7C. IS THIS PDF BEING SUBMITTED AS THE RESULT OF AN ENFORCEMENT ACTION? IF YES, PLEASE LIST:
No

8A. TYPE OF EMISSION SOURCE (CHECK ONE):
☐ **NEW SOURCE** ☐ **ADMINISTRATIVE UPDATE**
☐ **MODIFICATION** ☒ **OTHER** (PLEASE EXPLAIN IN 11B)

8F. IF ADMINISTRATIVE UPDATE, DOES DAQ HAVE THE APPLICANT'S CONSENT TO UPDATE THE EXISTING PERMIT WITH THE INFORMATION CONTAINED HEREIN?
☐ **YES** ☒ **NO**

9. IS *DEMOLITION* OR PHYSICAL *RENOVATION* AT AN EXISTING FACILITY INVOLVED? ☐ **YES** ☒ **NO**

10A. DATE OF ANTICIPATED INSTALLATION OR CHANGE:	10B. DATE OF ANTICIPATED START-UP:
07/01/2016	07/15/2016

11A. PLEASE PROVIDE A **DETAILED PROCESS FLOW DIAGRAM** SHOWING EACH PROPOSED OR MODIFIED PROCESS EMISSION POINT AS **ATTACHMENT B**.

11B. PLEASE PROVIDE A **DETAILED PROCESS DESCRIPTION** AS **ATTACHMENT C.**

12. PLEASE PROVIDE **MATERIAL SAFETY DATA SHEETS (MSDS)** FOR ALL MATERIALS PROCESSED, USED OR PRODUCED AS **ATTACHMENT D**. FOR CHEMICAL PROCESSE, PLEASE PROVIDE A MSDS FOR EACH COMPOUND EMITTED TO AIR.

13A. **REGULATED AIR POLLUTANT EMISSIONS:**

⇒ **FOR A NEW FACILITY,** PLEASE PROVIDE PLANT WIDE EMISSIONS BASED ON THE POTENTIAL TO EMIT (PTE) FOR THE FOLLOWING AIR POLLUTANTS INCLUDING ALL PROCESSES.

⇒ **FOR AN EXISTING FACILITY,** PLEASE PROVIDE THE PROPOSED CHANGE IN EMISSIONS BASED ON THE PTE OF ALL PROCESS CHANGES FOR THE FOLLOWING AIR POLLUTANTS.

PTE FOR A GIVEN POLLUTANT IS TYPICALLY BEFORE AIR POLLUTION CONTROL DEVICES AND IS COLLECTED BASED ON THE MAXIMUM DESIGN CAPACITY OF PROCESS EQUIPMENT.

POLLUTANT	HOURLY PTE (LB/HR)	YEARLY PTE (TON/YR) (HOURLY PTE MULTIPLIED BY 8760 HR/YR) DIVIDED BY 2000 LB/TON
PM	0	
PM_{10}	0	
VOCs	0	
CO	0	
NO_x	0	
SO_2	0	
Pb	0	
HAPs (AGGREGATE AMOUNT)	0	
TAPs (INDIVIDUALLY)*	0	
OTHER (INDIVIDUALLY)*	0	

* ATTACH ADDITIONAL PAGES AS NEEDED

13B. PLEASE PROVIDE ALL **SUPPORTING CALCULATIONS** AS **ATTACHMENT E.**

CALCULATE AN HOURLY AND YEARLY PTE OF EACH PROCESS EMISSION POINT (SHOWN IN YOUR DETAILED PROCESS FLOW DIAGRAM) FOR ALL AIR POLLUTANTS LISTED ABOVE INCLUDING INDIVIDUAL HAP'S (LISTED IN SECTION 112[b] OF THE 1990 CAAA), TAP'S (LISTED IN 45CSR27), AND OTHER AIR POLLUTANTS (E.G. POLLUTANTS LISTED IN TABLE 45-13A OF 45CSR13, MINERAL ACIDS PER 45CSR7, ETC.).

14. **CERTIFICATION OF DATA**

I, JAY VALVO (*TYPE NAME*) ATTEST THAT ALL THE REPRESENTATIONS CONTAINED IN THIS APPLICATION, OR APPENDED HERETO, ARE TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE BASED ON INFORMATION AND BELIEF AFTER REASONABLE INQUIRY, AND THAT I AM A ***RESPONSIBLE OFFICIAL**** (*PRESIDENT, VICE PRESIDENT, SECRETARY OR TREASURER, GENERAL PARTNER OR SOLE PROPRIETOR*) OF THE APPLICANT.

SIGNATURE OF RESPONSIBLE OFFICIAL: Jo Valvo

TITLE: PLANT MANAGER DATE: 5 / 18 / 16

** THE DEFINITION OF THE PHRASE '***RESPONSIBLE OFFICIAL***' CAN BE FOUND AT 45CSR13, SECTION 2.23.

NOTE: PLEASE CHECK ENCLOSED ATTACHMENTS:

☒ **ATTACHMENT A** ☒ **ATTACHMENT B** ☒ **ATTACHMENT C** ☒ **ATTACHMENT D** ☒ **ATTACHMENT E**

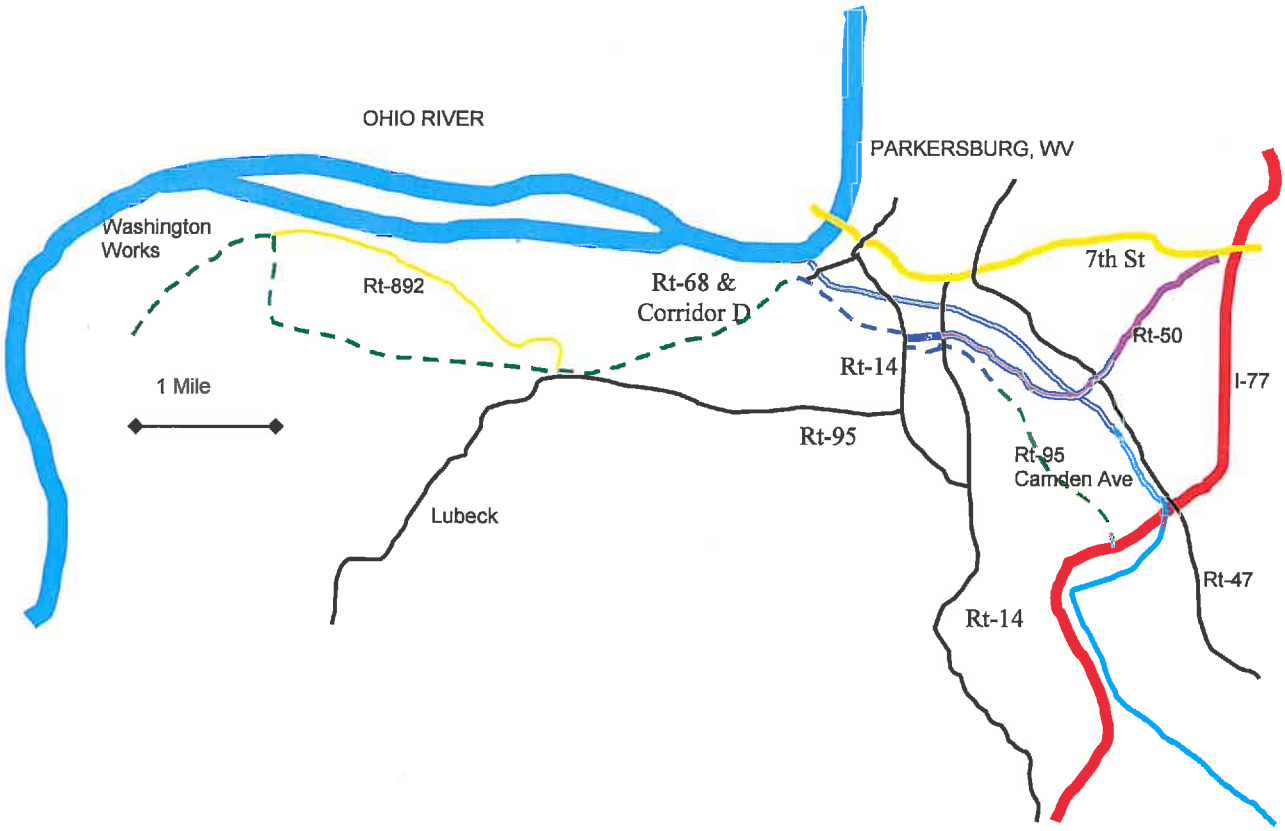
RECORDS ON ALL CHANGES ARE REQUIRED TO BE KEPT AND MAINTAINED ON-SITE FOR TWO (2) YEARS.

THE PERMIT DETERMINATION FORM WITH THE INSTRUCTIONS CAN BE FOUND ON DAQ'S PERMITTING SECTION WEB SITE:

www.wvdep.org

ATTACHMENT A

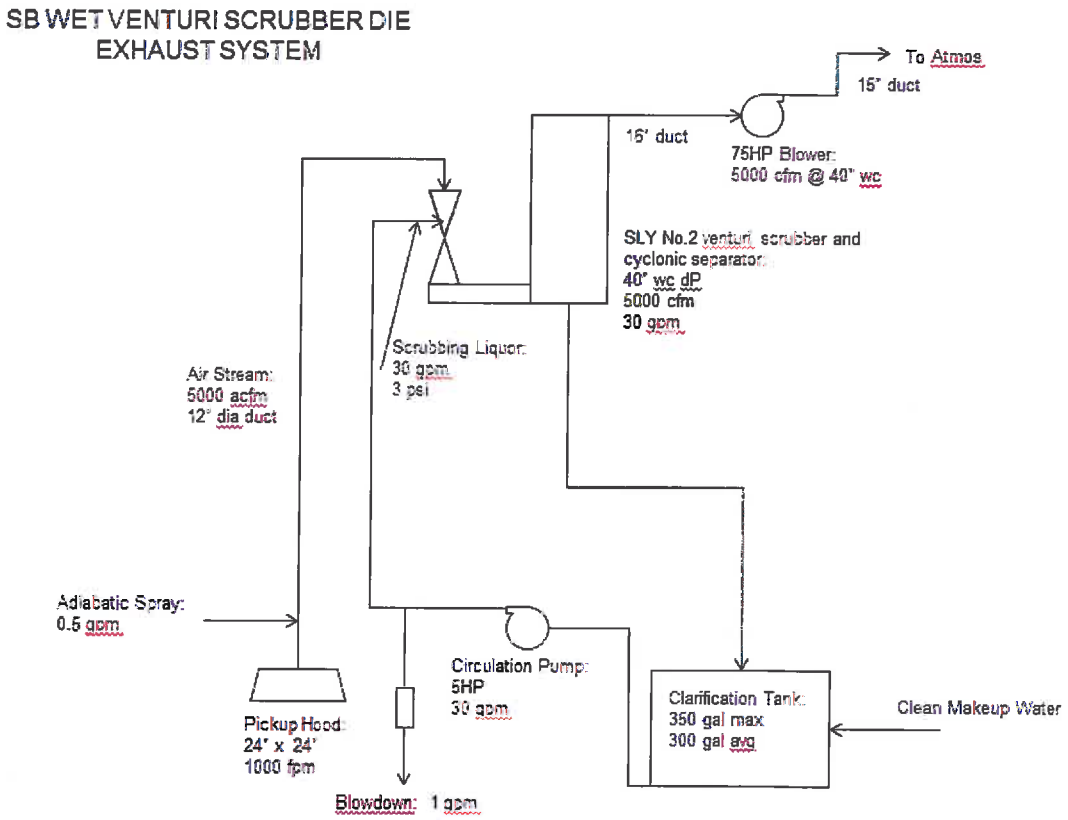
MAP to the Facility



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 B

Process Flow Diagram



ATTACHMENT C

Process/Project Description

An existing High Efficiency dry paper filter (HEAF) [293-C-03B] control device is being replaced with a wet recirculating type scrubber for the extrusion die vent [S293-S-02B]. There will be no change in the control efficiency for the control device associated with the source S293-S-02B. The use of the wet scrubber will improve operability of the system. There will be no change in the emissions associated with the process.

ATTACHMENT D

No new materials are being introduced into the process with this change in associated control device.

ATTACHMENT E

Supporting Calculations

Control efficiencies for the two different types of control devices are the same so no change in emissions is anticipated. A new copy of the APCD description sheet [Attachment M] has been included with this application. A new copy of the emission point summary [Attachment J] has also been included to reference the change in the control device.

EMISSION POINTS DATA SUMMARY SHEET

Table 1: Emissions Data

Emission Point ID No. *(Must match Emission Units Table & Plot Plan)*	Emission Point Type[1]	Emission Unit Vented Through This Point *(Must match Emission Units Table & Plot Plan)*		Air Pollution Control Device *(Must match Emission Units Table & Plot Plan)*		Vent Time for Emission Unit *(chemical processes only)*		All Regulated Pollutants - Chemical Name/CAS[3] *(Speciate VOCs & HAPS)*	Maximum Potential Uncontrolled Emissions[4]		Maximum Potential Controlled Emissions[5]		Emission Form or Phase *(At exit conditions, Solid, Liquid or Gas/Vapor)*	Est. Method Used[6]	Emission Concentration[7] (ppmv or mg/m^4)
		ID No.	Source	ID No.	Device Type	Short Term[2]	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
293-E-03B	Upward vertical stack	293-S-02B, Die	Extruder	293-E-03B	Wet Scrubber	C	8760	PM	10.90	47.74	0.08	0.34	S	EE	1950.6
								PM10	10.90	47.74	0.08	0.34	V	EE	1950.6
								VOC	0.07	0.31	0.07	0.31	V	EE	12.8
								CO	0.03	0.11	0.03	0.11	G	EE	4.5
								Ammonia	0.20	0.88	0.20	0.88	G	EE	35.8
								HAP (Formaldehyde 50000)	0.07	0.31	0.07	0.31	V	EE	12.8
								HAP (Acetaldehyde 75070)	0.02	0.08	0.02	0.08	V	EE	3.3
								HAP (Phenol 1089852)	1.75	7.67	.01	.05	V	EE	313.2

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] Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.

[2] 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).

[3] List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. **LIST** Acids, CO, CS_2, VOCs, H_2S, Inorganics, Lead, Organics, O_3, NO, NO_2, SO_2, SO_3, all applicable Greenhouse Gases (including CO_2 and methane), etc. **DO NOT LIST** H_2, H_2O, N_2, O_2, and Noble Gases.

[4] 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).

[5] 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).

[6] 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).

[7] Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m^3) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO_2, use units of ppmv (See 45CSR10).

Attachment J
EMISSION POINTS DATA SUMMARY SHEET

Table 2: Release Parameter Data

Emission Point ID No. *(Must match Emission Units Table)*	Inner Diameter (ft.)	Exit Gas			Emission Point Elevation (ft)		UTM Coordinates (km)	
		Temp. (°F)	Volumetric Flow [1] (acfm) *at operating conditions*	Velocity (fps)	Ground Level *(Height above mean sea level)*	Stack Height [2] *(Release height of emissions above ground level)*	Northing	Easting
293-E-03B	1.17	83	4000	62	630	30	4346800	4423100

[1] Give at operating conditions. Include inerts.
[2] Release height of emissions above ground level.

Attachment M
Air Pollution Control Device Sheet
(WET COLLECTING SYSTEM-SCRUBBER)

Control Device ID No. (must match Emission Units Table): S293-E-03B

Equipment Information

1. Manufacturer: SLY Inc.
   Model No. No. 2 Venturi Scrubber

2. Method: ☐ Packed Bed ☒ Venturi ☐ Spray Tower ☐ Cyclone ☐ Mechanical ☐ Orifice ☐ Other, specify

3. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.

4. Provide a scale diagram of the scrubber showing internal construction. Please include packing type and size, spray configurations, baffle plates, and mist eliminators.

5. What type of liquid entrainment eliminators or system will be used? Submit a schematic diagram showing thickness, mesh, and material of construction.

6. Describe the scrubber's construction material:
   304 SS

7. What will be the power requirements of the collector?
   Fan 75 HP Inlet scrubbing liquid pump: 5 HP

8. What type of fan(s) will be used?
   Type of fan blade: Steel Number of blades: 8 Diameter of blade: 26 in.
   Also supply a fan curve for each fan to be used.

9. Estimated gas pressure drop at maximum flow rate: 49 inches H_2O

Scrubbing Liquor Characteristics

10. Scrubbing Liquor

Composition	Weight %
1 Water	100
2	
3	
4	

11. Scrubbing liquor losses (evaporation, etc.): gal/1000 ACF gas

12. Liquor pressure to scrubber: 17.7 PSIA

13. Pressure drop through scrubber: 30 in. H_2O

14. Source of liquor (explain):
    Clarification tank

15. Liquor flow rates to scrubber:
    Design maximum: 40 gal/min
    Average expected: 30 gal/min

16. Describe system to be used to supply liquor to collector:
    A 5 hp pump will circulate 30 gpm of liquor from the 300 gal clarification tank to the scrubber. The tank level will be controlled with an automatic refill of clean water. A 1 gpm blowdown and periodic tank cleanings will be used to control the solids content in the liquor less than 5%.

17. Give the expected solids content of the liquor:
    Less than 5%.

18. If the liquor is to be recirculated, describe any treatment performed:
No treatment.

19. Data for Venturi Scrubber:
Throat Dimensions: 3.125in x 6.625in (Specify Units)
Throat Velocity: 466 ft/sec

20. Data for Packed Towers:
Type of Packing:
Superficial Gas Velocity through Bed:

Gas Stream Characteristics

21. Gas flow into the collector:
ACF @ 70 °F and 13.1 PSIA

22. Gas stream temperature:
Inlet: 64 °F
Outlet: 83 °F

23. Gas flow rate:
Design Maximum: 5000 ACFM
Average Expected: 4000 ACFM

24. Particulate Grain Loading in grains/scf:
Inlet: 0.36
Outlet: 0.0025

25. Emission rate of each pollutant (specify) into and out of collector:

Pollutant	IN		OUT		Guaranteed Minimum Collection Efficiency
	lb/hr	grains/acf	lb/hr	grains/acf	
A PM	10.90	0.36	0.08	0.0025	99.3
B PM 10	10.90	0.36	0.08	0.0025	99.3
C VOC	0.07		0.07		
D Carbon Monoxide	0.03		0.03		
E Ammonia	0.20		0.20		

26. Type of pollutant(s) controlled: ☐ SO_x ☐ Odor
☒ Particulate (type): VOC ☐ Other:

27. By what method were the uncontrolled emissions calculated? ☐ Material Balance ☐ Stack Test
☐ Pilot Test ☒ Other: Historical data

28. Dimensions of stack: Height 30 ft. Diameter 1.17 ft

29. Supply an equilibrium curve and/or solubility data (at various temperatures) for the proposed system.

30. Supply a curve showing proposed collection efficiency versus gas volume from 25 to 100 percent of design rating of collector.

Particulate Distribution

31. Complete the table:	Particle Size Distribution at Inlet to Collector	Fraction Efficiency of Collector
Particulate Size Range (microns)	**Weight % for Size Range**	**Weight % for Size Range**
0 – 2	31.5	99.3
2 – 4	27.4	99.3
4 – 6		99.3
6 – 8	27.4	99.3
8 – 10		99.3
10 – 12		99.3
12 – 16	27.4	99.3
16 – 20		
20 – 30		
30 – 40		
40 – 50		
50 – 60		
60 – 70		
70 – 80		
80 – 90		
90 – 100		
>100		

32. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification):
None.

33. Describe the collection material disposal system:
Periodic tank cleaning disposed to plant waste water treatment facility

34. Have you included ***Wet Collecting (Scrubber) Control Device*** in the Emissions Points Data Summary Sheet?

35. **Proposed Monitoring, Recordkeeping, Reporting, and Testing**
Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING:	RECORDKEEPING:
The differential pressure (dP) across the venturi will be maintained at 26 inches water column or greater, and monitored daily while equipment is in production to demonstrate compliance.	Record daily dP reading on log sheet, or other electronic means, while equipment is in production.
REPORTING:	TESTING:

MONITORING:	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 or air control device.
RECORDKEEPING:	Please describe the proposed recordkeeping that will accompany the monitoring.
REPORTING:	Please describe any proposed emissions testing for this process equipment on air pollution control device.
TESTING:	Please describe any proposed emissions testing for this process equipment on air pollution control device.

36. Manufacturer's Guaranteed Capture Efficiency for each air pollutant.
12" wc pressure drop = 96.78% total efficiency (20 microns down to 1 micron)
20" wc pressure drop = 98.81% total efficiency (20 microns down to 1 micron)
30" wc pressure drop = 99.49% total efficiency (20 microns down to 1 micron)
40" wc pressure drop = 99.77% total efficiency (20 microns down to 1 micron)

37. Manufacturer's Guaranteed Control Efficiency for each air pollutant.
PM = 99.3%
PM10 = 99.3%

38. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.
Overall collection efficiency is controlled by pressure drop through venturi. Maintain pressure drop of 26 inches water column or greater produced 99.3% or higher efficiency down to 1 micron.

Attachment S

Title V Permit Revision Information

1. New Applicable Requirements Summary	
Mark all applicable requirements associated with the changes involved with this permit revision:	
☐ SIP	☐ FIP
☒ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR15)	☐ Nonattainment NSR (45CSR19)
☐ Section 111 NSPS (Subpart(s)_____)	☐ Section 112(d) MACT standards (Subpart(s)_____)
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☐ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64) [1]
☐ NO_x Budget Trading Program Non-EGUs (45CSR1)	☐ NO_x Budget Trading Program EGUs (45CSR26)
[1] If this box is checked, please include **Compliance Assurance Monitoring (CAM) Form(s)** for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why **Compliance Assurance Monitoring** is not applicable:	

2. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

a. 40 C.F.R. 60, Subpart K - "Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978." There are no petroleum liquid storage tanks in the Specialty Compounding Division.

b. 40 C.F.R. 60, Subpart Ka - "Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984." There are no petroleum liquid storage tanks in the Specialty Compounding Division.

c. 40 C.F.R. 60, Subpart Kb - "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984." There are no volatile organic liquid storage tanks in the Specialty Compounding Division.

d. 40 C.F.R. 60, Subpart VV - "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry." The Specialty Compounding Division does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.

e. 40 C.F.R. 60, Subpart DDD - "Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry." The Specialty Compounding Division does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.

f. 40 C.F.R. 60, Subpart RRR - "Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes." The Specialty Compounding Division does not produce any of the chemicals listed in §60.707 as a product, co-product, by-product, or intermediate.

g. 40 C.F.R. 61, Subpart V - "National Emission Standards for Equipment Leaks (Fugitive Emissions Sources)." Applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in the Specialty Compounding Division.

h. 40 C.F.R. 63, Subpart F – "National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry." 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).

i. 40 C.F.R. 63, Subpart G – "National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater." 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).

j. 40 C.F.R. 63, Subpart H - "National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks." 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).

k. 40 C.F.R. 63, Subpart DD – "National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations." The Specialty Compounding Division does not receive off-site materials as specified in paragraph 40 C.F.R. §63.680(b) and the operations are not one of the waste management operations or recovery operations as specified in 40 C.F.R. §§63.680(a)(2)(i) through (a)(2)(vi).

l. 40 C.F.R. 63, Subpart YY – "National Emission Standards for Hazardous Air Pollutant for Source Categories: Generic Maximum Achievable Control Technology Standards." The Specialty Compounding Division is not one of the source categories and affected sources specified in 40 C.F.R. §§63.1103(a) through (h).

m. 40 C.F.R. 63, Subpart JJJ - "National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins." The Specialty Compounding Division does not produce the materials listed in 40 C.F.R. §63.1310.

n. 40 C.F.R. 63, Subpart EEEE – "National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline)." The Specialty Compounding Division does not operate an organic liquids distribution (OLD) operation or does not handle material organic liquids as defined in §63.2406.

o. 40 C.F.R. 63, Subpart PPPP – "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products." The Specialty Compounding Division does not produce an intermediate or final product that meets the definition of a "surface coated" plastic part.

p. 40 C.F.R. 63, Subpart WWWW - "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production." The Specialty Compounding Division does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.

q. 40 C.F.R. 63, Subpart ZZZZ – "National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines." The Specialty Compounding Division does not have a stationary Reciprocating Internal Combustion Engine (RICE) as defined by 40 C.F.R. §63.6675.

r. 40 C.F.R. 63, Subpart GGGGG – "National Emission Standards for Hazardous Air Pollutants: Site Remediation." The Specialty Compounding Division does not conduct site remediation as defined by 40 C.F.R. §63.7957 that meets all three of the conditions specified in 40 C.F.R. §§63.7881(a)(1) through (a)(3).

s. 40 C.F.R. 63, Subpart HHHHH – "National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing." The Specialty Compounding Division does not produce, blend, or manufacture coatings as part of the manufacturing process.

t. 40 C.F.R. 63, Subpart NNNNN – "National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production." The Specialty Compounding Division is not an HCl production facility as defined by 40 C.F.R. §63.9075.

u. 40 C.F.R. 82, Subpart B - "Protection of Stratospheric Ozone." Requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing equipment need to be licensed. The Specialty Compounding Division does not conduct motor vehicle maintenance involving CFCs on site.

v. 40 C.F.R. 82, Subpart C – "Protection of Stratospheric Ozone." Bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. The Specialty Compounding Division does not use, manufacture, nor distribute these materials.

w. 45CSR10 – "To Prevent and Control Air Pollution from the Emission of Sulfur Oxides." The Specialty Compounding Division does not contain any fuel burning units subject to the sulfur dioxide weight emission standards of 45CSR§10-3. Also, per 45CSR§10-4.1.e, manufacturing process source operations in the Specialty Compounding Division are exempt from the sulfur dioxide concentration limits of 45CSR§10-4.1 because the potential to emit of sulfur dioxide is less than 500 pounds per year.

x. 45CSR16 – "Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60." The Specialty Compounding Division is not subject to any requirements under 40 C.F.R. 60.
y. 45CSR17 – "To Prevent and Control Particulate Matter Air Pollution from Materials Handling,

Preparation, Storage and Other Sources of Fugitive Particulate Matter." Per 45CSR§17-6.1, the Specialty Compounding Division is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.

z. 45CSR§21-40 – "Other Facilities that Emit Volatile Organic Compound (VOC)." None of the emission sources in Specialty Compounding Division have maximum theoretical emissions of 6 pounds per hour or more and are not subject to the requirements of this section.

aa. 45CSR§27-4.1 – "To Prevent and Control the Emissions of Toxic Air Pollutants: Fugitive Emissions of Toxic Air Pollutants." The equipment in the Specialty Compounding Division is not in "toxic air pollutant service" as defined by 45CSR§27-2.11 is not subject to the requirements of 45CSR§27-4.1.

bb. 40 C.F.R. Part 64 – Compliance Assurance Monitoring. None of the emission units listed in the renewal application (and any revised application pages) have pre-control device emissions of a regulated air pollutant greater than the major source threshold for that pollutant; therefore, none of the emission units meet applicability criterion of 40 C.F.R. §64.2(a)(3). Thus CAM is not applicable to any emission unit listed in the SCD renewal application.

☒ **Permit Shield Requested** *(not applicable to Minor Modifications)*

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

3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision? ☐ Yes ☒ No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R13-1533K	07/18/2011	
R13-2617I	12/8/2014	
	/ /	

5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision		
Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
	MM/DD/YYYY	
	/ /	
	/ /	

6. Change in Potential Emissions	
Pollutant	Change in Potential Emissions (+ or -), TPY
No changes in emissions	
All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.	

7. Certification For Use Of Minor Modification Procedures ***(Required Only for Minor Modification Requests)***

Note:	*This certification must be signed by a responsible official. 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 45CSR§30-6.5.a.1.A. (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 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed): _____ *(Please use blue ink)* Date: 5 / 18 / 16 *(Please use blue ink)*

Named (typed): *Jay Valvo* Title: *Plant Manager*

Note: Please check if the following included (if applicable):

☐	Compliance Assurance Monitoring Form(s)
☐	Suggested Title V Draft Permit Language

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