

## FILE INDEX

**Applicant :** Kuraray America, Inc.  
**Facility :** Kuraray Washington Works

**Plant ID No.:** 107-00181  
**County:** Woods

**Region:** 2  
**Permit No.:** R13-1230A

### Chronological Order - Add Index Pages As Necessary

Date	To	From	Subject
11/12/15	Cathy Wheeler	Sandra Adkins	Email – Info about public notice.
11/12/15	EPA: Wentworth, Bradley; Mark Gaston	Sandra Adkins	Durham, McCumbers, McKeone, Hammonds, Rice, Legg, Taylor
11/2/15	Sandra Adkins	Mary Buck	Email – Ad received. Scheduled to run 11/5.
11/2/15	Mary Buck	Sandra Adkins	Email – Publish advertisement.
10/30/15	John Leg	Mark Gaston	Email- Agrees with draft.
10/29/15	File	John Legg	Pages removed from application because they were revised.
10/29/15	John Legg	Mark Gaston	Email – Removes “Confidential” from the Plot Plan, Line #1 application sheet.
10/29/15	John Legg	Mark Gaston	Email – Revises Fugitive Leak Source Data Sheet in Application.
10/28/15	John Legg	Mark Gaston	Email – Comments on Draft Permit.
10/27/15	File	John Legg	Draft Permit.
10/27/15	File	John Legg	Tracking Manifest; Airtraks Application Information Sheet; Airtraks Days Open Report; Information Table for Legal Ad; Legal Ad.
10/27/15	File	John Legg	Engineering evaluation
10/27/15	Mark Gaston	John Legg	Email – Adding generic LDAR to draft permit.
10/22/15	Mark Gaston	John Legg	Email – Changes to application R13-1230A.
10/19-23/15	File	John Legg	Background information used to write draft permit: Title V fact sheet & permit; and old R13-1230.
10/14/15	Mark Gaston	John Legg	Email – Work to begin on draft permit 10/19/15.
9/10/15	Mark H. Gaston	John Legg	Complete Letter.
9/10/15	Mark Gaston John Legg	John Legg Mark Gaston	Email related to permit application: Application deemed complete; and thank you.
9/2/15	John Legg	Mark H. Gaston	Cover letter and attached application changes for Baghouse B33C.
9/2/15	John Legg Mark Gaston	Mark Gaston John Legg	Email and send a complete or incomplete letter.
9/1/15	File	John Legg	Old revised pages (7/15/15 and 9/1/15) from application R13-1230A.
7/15/15	John Legg	Mark H. Gaston	Cover Letter for confidential information. related to permit application: Final design complete; and look over information
7/15/15	John Legg	Mark H. Gaston	Cover letter for revised permit application pages.
7/6 and 7/2/15	Mark Gaston	John Legg	Emails related to permit application: incomplete letter and supporting calculations all marked confidential.
7/2/15	Mark H. Gaston	John Legg	Incomplete Letter; Table of Redacted Information; 45CSR31; 45CSR31A; and 45CSR31B.
6/29/15	Mark H. Gaston	John Legg	Email with attached: Completeness Determination—Confidential Business Information (CBI)
6/25/15	James P. Fedczak, II	Mark H. Gaston	Cover Letter and attached affidavit of publication of legal notice.
6/24/15	Sandra Adkins	Mark Gaston	Email in response to Sandra Adkins 6/23/15 email. This email is filed/printed with an email dated 6/29/15.
6/23/15	Mr. Crews	Sandra Adkins	Email – Application Status Letter; Incomplete Application Checklist; Airtrak Permit/Application Information Sheet;
6/17/15	James P. Fedczak, II	Mark H. Gaston	Cover for Confidential Information

<b>Date</b>	<b>To</b>	<b>From</b>	<b>Subject</b>
6/17/15	James P. Fedczak, II	Mark H. Gaston	Cover Letter and Permit Application.

John Legg  
11/03/15

**From:** Adkins, Sandra K  
**Sent:** Monday, November 02, 2015 4:47 PM  
**To:** Wheeler, Cathy L  
**Cc:** Legg, John C  
**Subject:** DAQ Public Notice

← 11/2/15

Please see below the Public Notice for Draft Permit R13-1230A for Kuraray America, Inc.'s Washington Works facility located in Wood County.

The notice will be published in *The Parkersburg News* on Thursday, November 5, 2015, and the thirty day public comment period will end on Monday, December 7, 2015.

## **AIR QUALITY PERMIT NOTICE**

### **Notice of Intent to Approve**

On June 17, 2015, Kuraray America, Inc. (Kuraray) applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a modification to their existing permit R13-1230 for a product drying expansion. The plant is located at 8480 DuPont Road, Washington, Wood County, WV at latitude 39.2350N and longitude 81.6677W. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed facility. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-1230A.

The following potential emission increases will be authorized by this permit action: Particulate Matter, 4.0 tons per year (TPY); Volatile Organic Compounds, 0.39 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on Monday, December 7, 2015. A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed modification will meet all State and Federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

John Legg  
WV Department of Environmental Protection  
Division of Air Quality  
601 57th Street, SE  
Charleston, WV 25304  
Telephone: 304/926-0499, ext. 1257  
FAX: 304/926-0478

Legg, John C

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**From:** Adkins, Sandra K  
**Sent:** Monday, November 02, 2015 2:41 PM  
**To:** wentworth.paul@epa.gov; bradley.megan@epa.gov; mark.gaston@kuraray.com  
**Cc:** Durham, William F; McCumbers, Carrie; McKeone, Beverly D; Hammonds, Stephanie E; Rice, Jennifer L; Legg, John C; Taylor, Danielle R  
**Subject:** WV Draft Permit R13-1230A for Kuraray America, Inc.; Washington Works  
**Attachments:** 1230A.pdf; Eval1230A.pdf; Notice.pdf

11/2/15

Please find attached the Draft Permit R13-1230A, Engineering Evaluation, and Public Notice for Kuraray America, Inc.'s Washington Works facility located in Wood County.

The notice will be published in *The Parkersburg News* on Thursday, November 5, 2015, and the thirty day public comment period will end on Monday, December 7, 2015.

Should you have any questions or comments, please contact the permit writer, John Legg, at 304-926-0499 x 1257.

Legg, John C

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**From:** Adkins, Sandra K  
**Sent:** Monday, November 02, 2015 2:40 PM  
**To:** Mary Buck  
**Cc:** Legg, John C  
**Subject:** RE: Publication of Class I Legal Ad for the WV Division of Air Quality

← 11/2/15

Thank you!

**From:** Mary Buck [<mailto:legalads@newsandsentinel.com>]  
**Sent:** Monday, November 02, 2015 2:24 PM  
**To:** Adkins, Sandra K <[Sandra.K.Adkins@wv.gov](mailto:Sandra.K.Adkins@wv.gov)>  
**Subject:** Re: Publication of Class I Legal Ad for the WV Division of Air Quality  
**Importance:** High

This confirms receipt of the legal ad. I will schedule for publication for 11/5.

Thanks,

Mary Buck  
Legal Advertising

Parkersburg Newspapers Inc.  
PO Box 1787  
Parkersburg WV 26102-1787

P: (304) 485-1891 Ext. 301

P: (800) 642-1997 Ext. 301

F: (304) 422-2660

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-----Original Message-----

**From:** "Adkins, Sandra K" <[Sandra.K.Adkins@wv.gov](mailto:Sandra.K.Adkins@wv.gov)>

**To:** "Mary Buck" <[legalads@newsandsentinel.com](mailto:legalads@newsandsentinel.com)>

**Cc:** "Legg, John C" <[John.C.Legg@wv.gov](mailto:John.C.Legg@wv.gov)>

**Date:** 11/02/15 01:24 PM

**Subject:** Publication of Class I Legal Ad for the WV Division of Air Quality

Mary,

This is the correct ad to publish on 11/5. Thank you!

Please publish the information below as a Class I legal advertisement (one time only) in the Thursday, November 5, 2015, issue of *The Parkersburg News*. Please let me know that this has been received and will be published as requested. Thank you.

Send the invoice for payment and affidavit of publication to:

**Sandra Adkins**

**WV Department of Environmental Protection  
DIVISION OF AIR QUALITY**

**From:** Adkins, Sandra K  
**Sent:** Monday, November 02, 2015 12:40 PM  
**To:** Mary Buck  
**Cc:** Legg, John C  
**Subject:** Publication of Class I Legal Ad for the WV Division of Air Quality

11/2/15

Please publish the information below as a Class I legal advertisement (one time only) in the Wednesday, November 4, 2015, issue of *The Parkersburg News*. Please let me know that this has been received and will be published as requested. Thank you.

Send the invoice for payment and affidavit of publication to:

**Sandra Adkins**

**WV Department of Environmental Protection  
DIVISION OF AIR QUALITY**

**601- 57th Street**

**Charleston, WV 25304**

## **AIR QUALITY PERMIT NOTICE**

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The following potential emission increases will be authorized by this permit action: Particulate Matter, 4.0 tons per year (TPY); Volatile Organic Compounds, 0.39 TPY.

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The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed modification will meet all State and Federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

John Legg  
WV Department of Environmental Protection  
Division of Air Quality

601 57th Street, SE  
Charleston, WV 25304  
Telephone: 304/926-0499, ext. 1257  
FAX: 304/926-0478

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

[www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx](http://www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx)

Legg, John C

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**From:** Gaston, Mark <Mark.Gaston@kuraray.com>  
**Sent:** Friday, October 30, 2015 10:42 AM  
**To:** Legg, John C  
**Subject:** RE: Correct DRAFT Permit with Generic LDAR - R13-1230A - Kuraray America, Inc. (107-00181)

← 10/30/15

John,

Thank you for processing my changes and responding to my questions. I have reviewed the revised permit and I agree with the revisions. I agree that the permit can now go to Beverly McKeone for her review, and then to public comment.

Regards,

Mark H. Gaston  
Sr. Process Engineer – Sr. Environmental Consultant  
Kuraray Interlayer Solutions

Kuraray America, Inc.  
PVB Division  
8480 DuPont Road  
Washington, WV 26181  
Phone: 304-210-9192  
Web: <http://www.trosifol.com/>  
<http://www.sentryglas.com/>  
mailto: [Mark.Gaston@kuraray.com](mailto:Mark.Gaston@kuraray.com)

**From:** Legg, John C [mailto:John.C.Legg@wv.gov]  
**Sent:** Thursday, October 29, 2015 5:25 PM  
**To:** Gaston, Mark  
**Subject:** Correct DRAFT Permit with Generic LDAR - R13-1230A - Kuraray America, Inc. (107-00181)

Mark,

Please see my comments in red below.

John

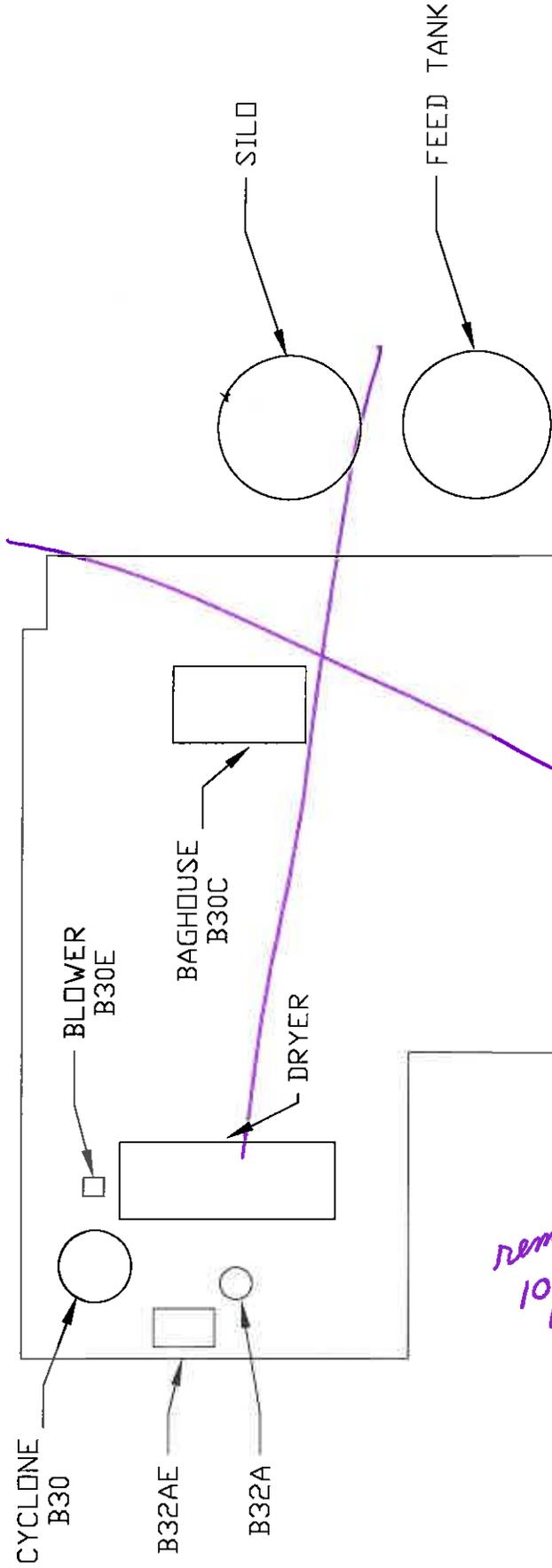
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**From:** Gaston, Mark [mailto:Mark.Gaston@kuraray.com]  
**Sent:** Wednesday, October 28, 2015 4:18 PM  
**To:** Legg, John C  
**Subject:** FW: R13-1230A - Kuraray America, Inc. (107-00181)

John,

I have completed my review of the draft of the revised R13-1230A permit. I revised Section 1, "Emission Units" to update the air flows for the L#1 rework bagfilter and the L#2 Cyclone and Bag House in the "Design Capacity" column. The B32A Line #1 rework bagfilter changed from 450 CFM @ 4 psi vac to 480 CFM @ 7.35 psi vac (I fixed this), and the air flow for Line #2 Cyclone and Line #2 bag house changed from 70,000 CFM to 67,500 (I think I had this correct

PLOT PLAN  
LINE #1



10/29/15  
pages from the application that were ~~removed~~ removed. John Legg

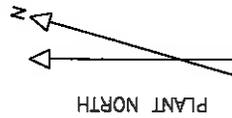
SCALE: 1" = 15'

UTM COORDINATES

NORTHING 4346.940 kilometers  
EASTING 442.402 kilometers  
(Northwest corner of building)

~~CONFIDENTIAL~~  
1/14/92

removed  
10/29/15



10' 38"



**Attachment L  
EMISSIONS UNIT DATA SHEET  
CHEMICAL PROCESS**

For chemical processes please fill out this sheet and all supplementary forms (see below) that apply. Please check all supplementary forms that have been completed.

- Emergency Vent Summary Sheet*
- Leak Sources Data Sheet*
- Toxicology Data Sheet*
- Reactor Data Sheet*
- Distillation Column Data Sheet*

1. Chemical process area name and equipment ID number (as shown in *Equipment List Form*)  
PVB Resin Drying. B30, B32A, B33, B34

2. Standard Industrial Classification Codes (SICs) for process(es)  
2821

3. List raw materials and  attach MSDSs  
Polyvinyl butyral  
Propylene glycol (ancillary use only)

4. List Products and Maximum Production and  attach MSDSs

Description and CAS Number	Maximum Hourly (lb/hr)	Maximum Annual (ton/year)
Polyvinyl butyral - L#1 63148-65-2	Redacted	Redacted
Polyvinyl butyral - L#2 63148-65-2	Redacted	Redacted

5. Complete the *Emergency Vent Summary Sheet* for all emergency relief devices.

6. Complete the *Leak Source Data Sheet* and describe below or attach to application the leak detection or maintenance program to minimize fugitive emissions. Include detection instruments, calibration gases or methods, planned inspection frequency, and record-keeping, and similar pertinent information. If subject to a rule requirement (e.g. 40CFR60, Subpart VV), please list those here.

See attached sheet.

7. Clearly describe below or attach to application Accident Procedures to be followed in the event of an accidental spill or release.

The facility executes field patrols each shift to check for spills and leaks, and other abnormal situations. Any spilled PVB solid will be vacuumed up using the rework vacuum system and conveyed to a waste bin. Any spilled brine will be contained with absorbent mats or pigs, and will be diverted to the site WWTP. Project design will also include provision to divert and contain spilled brine to a sump for subsequent proper disposal.

*removed  
10/29/15*

8A. Complete the *Toxicology Data Sheet* or attach to application a toxicology report (an up-to-date material safety data sheets (MSDS) may be used) outlining the currently known acute and chronic health effects of each compound or chemical entity emitted to the air. If these compounds have already been listed in Item 3, then a duplicate MSDS sheet is not required. Include data such as the OSHA time weighted average (TWA) or mutagenicity, teratogenicity, irritation, and other known or suspected effects should be addressed. Indicate where these are unknown, and provide references.

8B. Describe any health effects testing or epidemiological studies on these compounds that are being or may be conducted by the company or required under TSCA, RCRA or other federal regulations. Discuss the persistence in the environment of any emission (e.g. pesticides, etc.).

9. **Waste Products** - Waste products status: (If source is subject to RCRA or 45CSR25, please contact the Hazardous Waste Section of WVDEP, OAQ at (304) 926-3647.)

9A. Types and amounts of wastes to be disposed:

9B. Method of disposal and location of waste disposal facilities: 1600 TPY of polyvinyl butyral resin, maximum to Northwestern Landfill, Parkersburg, WV

9C. Check here if approved USEPA/State Hazardous Waste Landfill will be used

10. Maximum and Projected Typical Operating Schedule for process or project as a whole (circle appropriate units).

circle units:	(hrs/day) (hr/batch)	(days), (batches/day), (batches/week)	(days/yr), (weeks/year)
10A. Maximum	24 hr/day		365 day/yr
10B. Typical	24 hr/day		350 day/yr

11. Complete a *Reactor Data Sheet* for each reactor in this chemical process.

12. Complete a *Distillation Column Data Sheet* for each distillation column in this chemical process.

**13. 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**

See Attachment O

**RECORDKEEPING**

See Attachment O

**REPORTING**

See Attachment O

**TESTING**

See Attachment O

**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 operation or air pollution control device.

**RECORDKEEPING.** Please describe the proposed recordkeeping that will accompany the monitoring.

**REPORTING.** Please describe the proposed frequency of reporting of the recordkeeping.

**TESTING.** Please describe any proposed emissions testing for this process equipment or air pollution control device.

14. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

See the EUD Sheets and the APCD sheets for the specific equipment items.

*removed*

*10/29/15*

## INFORMATION REQUIRED FOR CHEMICAL PROCESSES

The notes listed below for chemical processes are intended to help the applicant submit a complete application to the OAQ; these notes are not intended to be all inclusive. The requirements for a complete application for a permit issued under 45CSR13 are designed to provide enough information for a permit reviewer to begin a technical review. Additional information beyond that identified may be required to complete the technical review of any individual application.

### Process Description

Please keep these points in mind when completing your process description as part of this permit application.

1. Provide a general process overview. This brief, but complete, process description should include chemical or registered trademark names of chemical products, intermediates, and/or raw materials to be produced or consumed, and the ultimate use(s) of the product(s). A list of the various chemical compounds is helpful.
2. Describe each process step. Include the process chemistry and stoichiometrically balanced reaction equation or material mass balance on all components.
3. Describe the methods and equipment used to receive, store, handle, and charge raw materials.
4. Describe the methods and equipment used to handle, store, or package final products and intermediates.
5. Provide process flow diagrams or equipment layout drawings which clearly show the process flow relationships among all pieces of process and control equipment. Identify all air emission discharge points. Discuss instrumentation and controls for the process.
6. Discuss the possibilities of process upsets, the duration and frequency of upsets, and consequences (including air emissions) of these upsets. Include a description of rupture discs, pressure relief valves, and secondary containment systems.
7. Discuss any fugitive emissions and the methods used to minimize them.
8. Include the following plans for the process if available:
  - a. preventative maintenance and malfunction abatement plan (recommended for all control equipment).
  - b. continuous emissions (in-stack) monitoring plan
  - c. ambient monitoring plan
  - d. emergency response plan

### Regulatory Discussion

The following state and federal air pollution control regulations may be applicable to your chemical process. You should review these regulations carefully to determine if they apply to your process. Please summarize the results of your review in your permit application along with any other regulations you believe are applicable.

- Title 45 Legislative Rule Division of Environmental Protection, Office of Air Quality contains West Virginia's air pollution control regulations, including the following promulgated rules which may require emissions reductions or control technologies for your chemical process:
  - a. 45CSR27 - Best Available Technology (BAT) for Toxic Air Pollutants (TAPs)
  - b. 45CSR21 - VOC emissions controls for ozone maintenance in Kanawha, Cabell, Putnam, Wayne, and Wood counties.
  - c. 45CSR13 (Table 45-13A) - plantwide emission thresholds for permitting for certain pollutants.
- Federal Guidelines for case-by-case MACT determinations under section 112(g) of the 1990 CAAA for individual and total HAPs greater than 10 and 25 tons per year, respectively.
- There are also subparts of the federal Standards of Performance for New Stationary Sources (NSPS), 40CFR60, 60, and the National Emission Standards for Hazardous Air Pollutants (NESHAP) at 40CFR61 and 40CFR63, which apply to various chemical and nonchemical processes. These subparts are too numerous to list here, but these areas of the federal regulations should be consulted carefully to determine applicability to your process.

### Emissions Summary and Calculations

Please keep these points in mind when submitting your emissions calculations as part of this permit application.

1. For each pollutant, provide the basis for the emissions estimate and for all emission reduction(s) or control efficiency(ies) claimed.
2. For all batch processes provide the following
  - a. Emissions of each pollutant in pound(s) per batch, from each process step
  - b. Annual emissions based on number of batches requested per year
  - c. The total time for each process step and the duration of the emissions during the process step
  - d. Total batch time, total emissions per batch (or per day), and annual emissions based on the number of batches requested per year.

## EMERGENCY VENT SUMMARY SHEET

List below all emergency relief devices, rupture disks, safety relief valves, and similar openings that will vent only under abnormal conditions.

Emission Point ID <sup>1</sup>	Equipment to Relief Vent (type, ID if available) <sup>2</sup>	Relief Vents (type) & Set Pressure (psig)	Name of Chemical(s) or Pollutants Controlled	Worst Case Emission per Release Event (lbs)
N/A	L#1 Dryer	RD (2) 1.45	Dust explosion	3000
B30E	Cyclone B30	RD 1.5	PVB*, Dust expl.	1000
B30E	Baghouse B30C	Braxton Doors	Dust explosion	500
B32AE	Rework Filter B32A	RD 2.5	PVB, Dust expl.	100
N/A	Silo Inlet Bagfilter	RD 2.9	PVB, Dust expl.	100
N/A	Silo Inlet Loop	RV 8.5	Air**	10 (PVB)
N/A	L#1 Silo	CV 0.25	Air**	0.1 (PVB)
N/A	L#1 Silo	Expl. Panels (2) 1.45	Dust explosion	1000
N/A	L#1 Silo Out. Bagfilter	RD 2.9	PVB, Dust expl.	100
N/A	L#1 Silo Outlet Loop	RV 4.0	Air**	20 (PVB)
N/A	L#1 Silo Outlet Loop	CV 0.8	Air**	50 (PVB)
N/A	L#2 Dryer	RD***	Dust explosion	4000
B33E	Cyclone B33	RD	PVB, Dust expl.	1000
B33E	Baghouse B33C	Braxton Doors	Dust explosion	500
B34E	Rework filter B34	RD	PVB, Dust expl.	100
N/A	L#2 Loop 1	RV	Air**	100
N/A	L#2 Bagfilter	RD	PVB, Dust expl.	100 (PVB)
N/A	L#2 Loop 2A	RV	Air**	20 (PVB)
N/A	L#2 Loop 2A	CV	Air**	50 (PVB)
N/A	L#2 Loop 2B	RV	Air**	20 (PVB)
N/A	L#2 Loop 2B	CV	Air**	50 (PVB)
			* Polyvinyl butryal	
			** Unless major upset	
			*** Number TBD	

All routine vents (non-emergency) should be listed on the *Emission Points Data Summary Sheet*.

<sup>1</sup> Indicate the emission point, if any, to which source equipment normally vents. Do not assign emission point ID numbers to each emergency relief vent or device.

<sup>2</sup> List all emergency relief devices next to the piece of equipment from which they control releases.

removed  
10/29/15

**LEAK SOURCE DATA SHEET**

Source Category	Pollutant	Number of Source Components <sup>1</sup>	Number of Components Monitored by Frequency <sup>2</sup>	Average Time to Repair (days) <sup>3</sup>	Estimated Annual Emission Rate (lb/yr) <sup>4</sup>
Pumps <sup>5</sup>	light liquid VOC <sup>6,7</sup>	0	N/A	N/A	N/A
	heavy liquid VOC <sup>8</sup>	7	0	2	138
	Non-VOC <sup>9</sup>	0	N/A	N/A	N/A
Valves <sup>10</sup>	Gas VOC	0	N/A	N/A	N/A
	Light Liquid VOC	0	N/A	N/A	N/A
	Heavy Liquid VOC	63	0	1	583
Safety Relief Valves <sup>11</sup>	Non-VOC	0	N/A	N/A	N/A
	Gas VOC	0	N/A	N/A	N/A
	Non VOC	0	N/A	N/A	N/A
Open-ended Lines <sup>12</sup>	VOC	1	0	N/A	17
	Non-VOC	0	N/A	N/A	N/A
	VOC	0	N/A	N/A	N/A
Sampling Connections <sup>13</sup>	Non-VOC	0	N/A	N/A	N/A
	Non-VOC	0	N/A	N/A	N/A
Compressors	VOC	0	N/A	N/A	N/A
	Non-VOC	0	N/A	N/A	N/A
Flanges	VOC	150	0	1	46
	Non-VOC	0	N/A	N/A	N/A
	VOC	N/A	N/A	N/A	N/A
Other	Non-VOC	2	0	7	<20

<sup>1-13</sup> See notes on the following page.

6 removed  
10/29/15

## Notes for Leak Source Data Sheet

1. For VOC sources include components on streams and equipment that contain greater than 10% w/w VOC, including feed streams, reaction/separation facilities, and product/by-product delivery lines. Do not include certain leakless equipment as defined below by category.
2. By monitoring frequency, give the number of sources routinely monitored for leaks, using a portable detection device that measures concentration in ppm. Do not include monitoring by visual or soap-bubble leak detection methods. "M/Q(M)/Q/SA/A/O" means the time period between inspections as follows:

Monthly/Quarterly, with Monthly follow-up of repaired leakers/Quarterly/Semi-annual/Annually/Other (specify time period)

If source category is not monitored, a single zero in the space will suffice. For example, if 50 gas-service valves are monitored quarterly, with monthly follow-up of those repaired, 75 are monitored semi-annually, and 50 are checked bimonthly (alternate months), with non checked at any other frequency, you would put in the category "valves, gas service:" 0/50/0/75/0/50 (bimonthly).

3. Give the average number of days, after a leak is discovered, that an attempt will be made to repair the leak.
4. Note the method used: MB - material balance; EE - engineering estimate; EPA - emission factors established by EPA (cite document used); O - other method, such as in-house emission factor (specify).
5. Do not include in the equipment count sealless pumps (canned motor or diaphragm) or those with enclosed venting to a control device. (Emissions from vented equipment should be included in the estimates given in the Emission Points Data Sheet.)
6. Volatile organic compounds (VOC) means the term as defined in 40 CFR §51.100 (s).
7. A light liquid is defined as a fluid with vapor pressure equal to or greater than 0.04 psi (0.3 Kpa) at 20°C. For mixtures, if 20% w/w or more of the stream is composed of fluids with vapor pressures greater than 0.04 psi (0.3 Kpa) at 20 °C, then the fluid is defined as a light liquid.
8. A heavy liquid is defined as a fluid with a vapor pressure less than 0.04 psi (0.3 Kpa) at 20°C. For mixtures, if less than 20% w/w of the stream is composed of fluids with vapor pressures greater than 0.04 psi (0.3 Kpa) at 20 °C, then the fluid is defined as a heavy liquid.
9. LIST CO, H<sub>2</sub>S, mineral acids, NO, NO<sub>2</sub>, SO<sub>3</sub>, etc. DO NOT LIST CO<sub>2</sub>, H<sub>2</sub>, H<sub>2</sub>O, N<sub>2</sub>, O<sub>2</sub>, and Noble Gases.
10. Include all process valves whether in-line or on an open-ended line such as sample, drain and purge valves. Do not include safety-relief valves, or leakless valves such as check, diaphragm, and bellows seal valves.
11. Do not include a safety-relief valve if there is a rupture disk in place upstream of the valve, or if the valve vents to a control device.
12. Open-ended lines include purge, drain and vent lines. Do not include sampling connections, or lines sealed by plugs, caps, blinds or second valves.
13. Do not include closed-purge sampling connections.

*removed*  
*10/29/15*



10/29/15

Legg, John C

---

**From:** Legg, John C  
**Sent:** Thursday, October 29, 2015 5:27 PM  
**To:** 'Gaston, Mark'  
**Subject:** RE: Kuraray Permit R13-1230A - Revised Line#1 Plot Plan

Thank you! Will place in application/file.

---

**From:** Gaston, Mark [<mailto:Mark.Gaston@kuraray.com>]  
**Sent:** Thursday, October 29, 2015 11:16 AM  
**To:** Legg, John C  
**Subject:** Kuraray Permit R13-1230A - Revised Line#1 Plot Plan

John,

Attached is the revised Line #1 Plot Plan with the word "CONFIDENTIAL" removed, as you requested. This completed the revisions to the permit application that you had asked me to make.

Regards,

Mark H. Gaston  
Sr. Process Engineer – Sr. Environmental Consultant  
[Kuraray Interlayer Solutions](#)

Kuraray America, Inc.  
PVB Division  
8480 DuPont Road  
Washington, WV 26181  
Phone: 304-210-9192  
Web: <http://www.trosifol.com/>  
<http://www.sentryglas.com/>  
mailto: [Mark.Gaston@kuraray.com](mailto:Mark.Gaston@kuraray.com)

10/29/15

**From:** Legg, John C  
**Sent:** Thursday, October 29, 2015 5:27 PM  
**To:** 'Gaston, Mark'  
**Subject:** RE: Kuraray Permit R13-1230A - Leak Source Data Sheet Revised

Thank you. Will place in application/file.

---

**From:** Gaston, Mark [<mailto:Mark.Gaston@kuraray.com>]  
**Sent:** Thursday, October 29, 2015 9:03 AM  
**To:** Legg, John C  
**Subject:** Kuraray Permit R13-1230A - Leak Source Data Sheet Revised

John,

Your questions about the brine cooling system prompted me to review my supporting documentation for the Leak Source Data sheet. I had used the component counts for only the new brine cooling system in Line #2. But as this permit modification incorporates the existing Line #1, which also has a brine cooling system, I should have included the total components for both lines. I have attached a revised Attachment L, "ECDS Chemical Process" with the total component counts and emissions from both lines.

Here is the content of my email to you of yesterday regarding the brine systems.

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For propylene glycol, that is a heavy liquid under R21 sec 37. We currently follow the requirements in R21 sec 37 for the heavy liquids we have, including the propylene glycol used in the Line #1 cooling system. In regard to the 0.4 ton/yr leak rate you mentioned, I answered in my email of yesterday as if this were from a loss-of-containment event. But this is actually a calculated annual fugitive emission using the EPA's average SOCMI factors from EPA-453/R-95-017. These factors are very conservative, and so the actual fugitive emissions are likely much lower than this.

-----

Regards,

Mark H. Gaston  
Sr. Process Engineer – Sr. Environmental Consultant  
[Kuraray Interlayer Solutions](#)

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<http://www.sentryglas.com/>  
mailto: [Mark.Gaston@kuraray.com](mailto:Mark.Gaston@kuraray.com)

10/29/15

**From:** Legg, John C  
**Sent:** Thursday, October 29, 2015 5:25 PM  
**To:** 'Gaston, Mark'  
**Subject:** Correct DRAFT Permit with Generic LDAR - R13-1230A - Kuraray America, Inc. (107-00181)  
**Attachments:** 107-00181\_PERM\_R13-1230A.doc

Mark,

Please see my comments in red below.

John

---

**From:** Gaston, Mark [<mailto:Mark.Gaston@kuraray.com>]  
**Sent:** Wednesday, October 28, 2015 4:18 PM  
**To:** Legg, John C  
**Subject:** FW: R13-1230A - Kuraray America, Inc. (107-00181)

John,

I have completed my review of the draft of the revised R13-1230A permit. I revised Section 1, "Emission Units" to update the air flows for the L#1 rework bagfilter and the L#2 Cyclone and Bag House in the "Design Capacity" column. The B32A Line #1 rework bagfilter changed from 450 CFM @ 4 psi vac to 480 CFM @ 7.35 psi vac (I fixed this), and the air flow for Line #2 Cyclone and Line #2 bag house changed from 70,000 CFM to 67,500 (I think I had this correct already because it was in your calculations). The 480 CFM value is from the original vendor drawing for the existing rework bagfilter. The 67,500 CFM is from a change the major equipment vendor made after I had started work on this permit modification. These changes affect only the Section 1, "Emission Units" in the draft permit and the permit application attachment I, "Emission Units Table". I had used the revised values in the supporting calculations, so there are no changes to the emissions or particulate concentrations.

I also revised the Emissions Unit Table by deleting the line for the silo, as you requested. The Emission Units Table exists as both public and CBI versions; I have attached revisions of each. Changes are shown in yellow highlight. Thank you!

Otherwise, I found only two typos to correct, both on page 2. I removed the suffix "A" from R13-1230, the original permit that is being modified and I removed an extra digit in our street address. I have attached a revision of the draft permit with these changes. Changes are shown in yellow highlight. Thank you!

As for permit application attachment E, "Plot Plan, Line #1", I give you authority to mark through the word "CONFIDENTIAL". I will send you a revised sketch tomorrow (I do not have the software to edit pdf documents myself). I got the revised sketch. Thank you!

For propylene glycol, that is a heavy liquid under R21 sec 37. We currently follow the requirements in R21 sec 37 for the heavy liquids we have, including the propylene glycol used in the Line #1 cooling system. In regard to the 0.4 ton/yr leak rate you mentioned, I answered in my email of yesterday as if this were from a loss-of-containment event. But this is actually a calculated annual fugitive emission using the EPA's average SOCFMI factors from EPA-453/R-95-017. These factors are very conservative, and so the actual fugitive emissions are likely much lower than this.

The generic LDAR language (sent to you after the first draft) is included in the final DRAFT permit [sections 4.2.2 (Monitoring); 4.3.1 and 4.3.2 (Testing)] attached to this email!

Finally, I have some questions on the following three sections:

**3.3.1, "Stack Testing", and 4.3, "Testing Requirements".** Are these two sections redundant? In our other permit, R13-2380E for the PVB Manufacturing area, essentially the same section appears as 3.3.1 but Section 4.3, "Testing Requirements" contains only one word, "[Reserved]". **I took out the testing sections 4.3.1 and 4.3.2. The generic LDAR sections (4.3.3 and 4.3.4) were re-numbered to 4.3.1 and 4.3.2.**

Because 3.3.1 appears in both our R13-1230A and R13-2380E, I assume that this is a standard language in R13 permits. That said, can you please confirm that the DAQ will not be expecting us to perform stack tests after the new drying line is constructed, commissioned, and operating? **No new stack tests need to be performed.**

**3.5.4.1, "Certificate to Operate".** Can you please provide me some more information about this? **Wrong language was used here (Non-title V/45 CSR 22). Language for Title V (Rule 30 or 45 CSR 30) now replaces wrong language.**

**3.5.5, "Emission Inventory".** On 10/13/15 I called Carrie McCumbers, Title V Program Manager, regarding the 2015 CES Invoice (report year 2014). Carrie noted that the Washington Works PVB facility, now separate from DuPont, has a PTE below the Title V major source thresholds. But, as it is still subject to a federal NESHAP, namely the MON, it is now classed as a Title V deferred source. Carrie confirmed with the AEI Group that as we are not a Title V major source, we are not required to submit the annual AEI's. However, she noted that this could change in the future.

**The "Emission Inventory" language says that Kuraray would only have to submit an emissions inventory if requested by the Secretary. This is standard language for all sources. This language does not obligate Kuraray to submit an inventory unless asked to.**

I considered adding one or two sentences at the beginning of this section, noting that we are not currently required to submit the annual air emissions inventory (we still must submit the annual CES invoice and payment). On the other hand, in the future, if the DAQ changes the requirement so that the AEI requirement would apply to Title V deferred sources, then this permit would have to be revised again and such added sentences removed. So I am not asking for changes to this section.

That said, I would like you to confirm that this section does not obligate us to prepare an annual AEI.

Regards,

Mark H. Gaston  
Sr. Process Engineer – Sr. Environmental Consultant  
[Kuraray Interlayer Solutions](#)

Kuraray America, Inc.  
PVB Division  
8480 DuPont Road  
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Web: <http://www.trosifol.com/>  
<http://www.sentryglas.com/>  
mailto: [Mark.Gaston@kuraray.com](mailto:Mark.Gaston@kuraray.com)

**From:** Gaston, Mark  
**Sent:** Tuesday, October 27, 2015 12:41 PM  
**To:** 'Legg, John C'  
**Subject:** RE: R13-1230A - Kuraray America, Inc. (107-00181)

10/28/15

Legg, John C

**From:** Gaston, Mark <Mark.Gaston@kuraray.com>  
**Sent:** Wednesday, October 28, 2015 4:18 PM  
**To:** Legg, John C  
**Subject:** FW: R13-1230A - Kuraray America, Inc. (107-00181)  
**Attachments:** 107-00181\_PERM\_R13-1230A - MHG rev.docx; R13-1230 rev - Att I - Emission Units Table rev.docx; R13-1230 rev - Att I - Emission Units Table - CBI rev.docx

John,

I have completed my review of the draft of the revised R13-1230A permit. I revised Section 1, "Emission Units" to update the air flows for the L#1 rework bagfilter and the L#2 Cyclone and Bag House in the "Design Capacity" column. The B32A Line #1 rework bagfilter changed from 450 CFM @ 4 psi vac to 480 CFM @ 7.35 psi vac, and the air flow for Line #2 Cyclone and Line #2 bag house changed from 70,000 CFM to 67,500. The 480 CFM value is from the original vendor drawing for the existing rework bagfilter. The 67,500 CFM is from a change the major equipment vendor made after I had started work on this permit modification. These changes affect only the Section 1, "Emission Units" in the draft permit and the permit application attachment I, "Emission Units Table". I had used the revised values in the supporting calculations, so there are no changes to the emissions or particulate concentrations.

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For propylene glycol, that is a heavy liquid under R21 sec 37. We currently follow the requirements in R21 sec 37 for the heavy liquids we have, including the propylene glycol used in the Line #1 cooling system. In regard to the 0.4 ton/yr leak rate you mentioned, I answered in my email of yesterday as if this were from a loss-of-containment event. But this is actually a calculated annual fugitive emission using the EPA's average SOCMF factors from EPA-453/R-95-017. These factors are very conservative, and so the actual fugitive emissions are likely much lower than this.

Finally, I have some questions on the following three sections:

**3.3.1, "Stack Testing", and 4.3, "Testing Requirements".** Are these two sections redundant? In our other permit, R13-2380E for the PVB Manufacturing area, essentially the same section appears as 3.3.1 but Section 4.3, "Testing Requirements" contains only one word, "[Reserved]".

Because 3.3.1 appears in both our R13-1230A and R13-2380E, I assume that this is a standard language in R13 permits. That said, can you please confirm that the DAQ will not be expecting us to perform stack tests after the new drying line is constructed, commissioned, and operating?

**3.5.4.1, "Certificate to Operate".** Can you please provide me some more information about this?

**3.5.5, "Emission Inventory".** On 10/13/15 I called Carrie McCumbers, Title V Program Manager, regarding the 2015 CES Invoice (report year 2014). Carrie noted that the Washington Works PVB facility, now separate from DuPont, has a PTE below the Title V major source thresholds. But, as it is still subject to a federal NESHAP, namely the MON,

it is now classed as a Title V deferred source. Carrie confirmed with the AEI Group that as we are not a Title V major source, we are not required to submit the annual AEI's. However, she noted that this could change in the future.

I considered adding one or two sentences at the beginning of this section, noting that we are not currently required to submit the annual air emissions inventory (we still must submit the annual CES invoice and payment). On the other hand, in the future, if the DAQ changes the requirement so that the AEI requirement would apply to Title V deferred sources, then this permit would have to be revised again and such added sentences removed. So I am not asking for changes to this section.

That said, I would like you to confirm that this section does not obligate us to prepare an annual AEI.

Regards,

Mark H. Gaston  
Sr. Process Engineer – Sr. Environmental Consultant  
[Kuraray Interlayer Solutions](#)

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mailto: [Mark.Gaston@kuraray.com](mailto:Mark.Gaston@kuraray.com)

**From:** Gaston, Mark  
**Sent:** Tuesday, October 27, 2015 12:41 PM  
**To:** 'Legg, John C'  
**Subject:** RE: R13-1230A - Kuraray America, Inc. (107-00181)

John,

Yes, I have received your email. I am working the draft permit review today. The existing drying line currently uses and the new drying line will use a brine of 26% to 30% propylene glycol in water. This is the brine referenced in Attachment O. It is / will be used in closed loop cooling systems for both drying lines. Were we to have loss of containment in the existing system, the spilled brine would drain to a trench the flows to a process sewer and from there to the site WWTP. The design of the new system will include similar provisions to keep any spilled brine from reaching the ground or storm water drains.

I will provide a more detailed response to you after I have finished my review.

Regards,

Mark H. Gaston  
Sr. Process Engineer – Sr. Environmental Consultant  
[Kuraray Interlayer Solutions](#)

Kuraray America, Inc.  
PVB Division

# INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name Kuraray America, Inc. (Company ID:107-00181)      Region: 2  
 Permitting Action Number R13-1230A      Total Days \_\_\_\_\_      DAQ Days \_\_\_\_\_

**Permitting Action:**

- |  |                                    |   |
|--|------------------------------------|---|
| <input type="radio"/> Permit Determination     | <input type="radio"/> Temporary    | <input checked="" type="radio"/> Modification |
| <input type="radio"/> General Permit (Class I) | <input type="radio"/> Relocation   | <input type="radio"/> PSD (Rule 14)           |
| <input type="radio"/> Administrative Update    | <input type="radio"/> Construction | <input type="radio"/> NNSR (Rule 19)          |

**Documents Attached:**

- |   |   |
|---|---|
| <input checked="" type="radio"/> Engineering Evaluation/Memo<br><input type="radio"/> Draft Permit<br><input type="radio"/> Notice<br><input type="radio"/> Denial<br><input checked="" type="radio"/> Final Permit/General Permit Registration | <input checked="" type="radio"/> Completed Database Sheet<br><input type="radio"/> Withdrawal<br><input type="radio"/> Letter<br><input type="radio"/> Other ( <i>specify</i> ) _____ |
|---|---|

Date	From	To	Action Requested
10/28/15	John Legg	Bev McKeone	Okay to go to DAQ Legal Notice!
11/2	<i>Blw</i>	<i>John</i>	<i>Auto Notice</i>

**NOTE:**      Retain a copy of this manifest for your records when transmitting your document(s).



**Permit / Application Information Sheet**  
**Division of Environmental Protection**  
**West Virginia Office of Air Quality**

<b>Company:</b>	Kuraray America, Inc.	<b>Facility:</b>	Washington
<b>Region:</b>	2	<b>Plant ID:</b>	107-00181
<b>Application #:</b>	13-1230A		
<b>Engineer:</b>	Legg, John	<b>Category:</b>	Chemical
<b>Physical Address:</b>	8480 DuPont Road Washington WV 26181	<b>SIC:</b> [2821] CHEMICALS AND ALLIED PRODUCTS - PLASTICS MATERIALS AND RESINS <b>NAICS:</b> [325211] Plastics Material and Resin Manufacturing	
<b>County:</b>	Wood	<b>SIC:</b> [2824] CHEMICALS AND ALLIED PRODUCTS - ORGANIC FIBERS, NONCELLULOSIC <b>NAICS:</b> [325222] Noncellulosic Organic Fiber Manufacturing	
<b>Other Parties:</b>	PLT_MGR - Crews, E. Ross 910-433-7117 Contact - Gaston, Mark 304-210-9192		

**Information Needed for Database and AIRS**  
 1. Need valid physical West Virginia address with zip  
 2. Inspection result

Regulated Pollutants		
VOC	Volatile Organic Compounds (Reactive organic gases)	0.390 TPY
PT	Total Particulate Matter	2.470 TPY

Summary from this Permit 13-1230A		
<b>Air Programs</b>	<b>Applicable Regulations</b>	
TITLE V	07 13 22	
<b>Fee Program</b>	<b>Fee</b>	<b>Application Type</b>
6B	\$1,000.00	MODIFICATION

**Notes from Database**  
 Permit Note: Modification permit for a second (Line #2) de-water, drying, and truck loading operation for Polyvinyl Butyral(PVB)resin/water slurry drying area/operation.

Activity Dates	
APPLICATION RECIEVED	06/17/2015
APPLICANT PUBLISHED LEGAL AD	06/18/2015
APPLICATION FEE PAID	06/23/2015
ASSIGNED DATE	06/23/2015
ADDITIONAL INFO RECEIVED	06/24/2015
APPLICATION INCOMPLETE	07/02/2015
ADDITIONAL INFO REQUESTED	07/17/2015
ADDITIONAL INFO RECEIVED	09/02/2015
APPLICATION DEEMED COMPLETE	09/02/2015

**NON-CONFIDENTIAL**

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 107-00181  
 Company: Kuraray America, Inc.  
 Printed: 10/28/2015  
 Engineer: Legg, John

Permit Writer	John Legg
Email Address	john.c.legg@wv.gov
Company Name	Kuraray America, Inc.
Company ID	107-00181
Facility Name	Kuraray Washington Works
Permit Number	R13-1230A
County	Wood
Newspaper	The Parkersburg News and Sentinel
Company Contact & Email	Mark H. Gaston <a href="mailto:Mark.Gaston@kuraray.com">Mark.Gaston@kuraray.com</a> (304) 210-9192
Consultant Email Address	None
Regional Office (if applicable)	None

# **AIR QUALITY PERMIT NOTICE**

## **Notice of Intent to Approve**

On June 17, 2015, Kuraray America, Inc. (Kuraray) applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a modification to their existing permit R13-1230 for a product drying expansion. The plant is located at 8480 DuPont Road, Washington, Wood County, WV at latitude 39.2350N and longitude 81.6677W. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed facility. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-1230A.

The following potential emission increases will be authorized by this permit action: Particulate Matter, 4.0 tons per year (TPY); Volatile Organic Compounds, 0.39 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on MM/DD/YYYY. A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed modification will meet all State and Federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

John Legg  
WV Department of Environmental Protection  
Division of Air Quality  
601 57th Street, SE  
Charleston, WV 25304  
Telephone: 304/926-0499, ext. 1257  
FAX: 304/926-0478

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

[www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx](http://www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx)

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Phone: 304-210-9192  
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<http://www.sentryglas.com/>  
mailto: [Mark.Gaston@kuraray.com](mailto:Mark.Gaston@kuraray.com)

10/27/15

**From:** Legg, John C [<mailto:John.C.Legg@wv.gov>]  
**Sent:** Tuesday, October 27, 2015 12:26 PM  
**To:** Gaston, Mark  
**Cc:** McKeone, Beverly D  
**Subject:** FW: R13-1230A - Kuraray America, Inc. (107-00181)

Dear Mark,

If possible, please let me know that you received this email.

Because of the concern voiced in my 10/22/15 email (restated below), I have added a generic LDAR section to the draft permit should there be any fugitive VOC emission source(s) in the PVB Resin Drying Process. The added sections to the draft permit are 4.2.2, 4.3.3 and 4.3.4. If I should not hear back from you by today's end (10/27/15), I plan to submit the revised draft permit to my boss Beverly McKeone asking permission to go to DAQ Legal Notice.

**Concern:** Please explain to me (or point me to the information in the application, but not the MSDS) about the ThermalStar Heat Transfer Fluid and where/how it is used in the process. Is it used in both dryers? Where is the propylene glycol leaked to (at a rate of 0.4 ton/yr)? Inside or outside the building? Just general information about the process, more than I have now. Is this material called Brine, i.e., closed loop brine system discussed in Attachment O/45CSR21 Section 37?

Generic LDAR add to draft permit:

- 4.2.2. The permittee shall implement and maintain leak detection and repair (LDAR) programs for the reduction of fugitive VOC emissions in all manufacturing process units subject to 45CSR§21-40 producing a product or products intermediate or final, in excess of 1,000 megagrams (1,100 tons) per year in accordance with the applicable methods and criteria of 45CSR§21-37 or alternate procedures approved by the Director. Procedures approved by the Director, 40CFR60, Subpart VV, 40CFR61, Subpart V, 40CFR63, Subpart H, 40CFR63, Subpart TT, 40CFR63, Subpart UU, 40CFR65, Subpart F, and 40CFR265, Subpart CC. This requirement shall apply to the VOC emitting equipment in the PVB Resin Drying Process irrespective of whether or not such units produce as intermediates or final products, substances on the lists contained with 40CFR60, 40CFR61, or 40CFR63. **[45CSR§21-40.3.a.2]**
- 4.3.3. Manufacturing process units subject to the LDAR requirement in section 4.2.2. of this permit may be exempted upon written request of the permittee to the Director. Exempted units are exempted from the frequency of testing as described in 45CSR§21-37, however, LDAR testing of this unit or certification of emission using approved fugitive emission factors will be required every three years, or upon request by the Director or his duly authorized representative. Waiver or scheduling of LDAR testing every three years may be granted by the Director if written request and justification are submitted by the permittee. Units exempted from testing which may be required under any other applicable State or Federal regulations, orders, or permits. The Director may periodically require verifications by the permittee that maintenance and repair procedures associated with approved exemptions are continued and practiced.

Legg, John C

**From:** Gaston, Mark <Mark.Gaston@kuraray.com>  
**Sent:** Tuesday, October 27, 2015 12:40 PM  
**To:** Legg, John C  
**Subject:** RE: R13-1230A - Kuraray America, Inc. (107-00181)

10/27/15

John,

Yes, I have received your email. I am working the draft permit review today. The existing drying line currently uses and the new drying line will use a brine of 26% to 30% propylene glycol in water. This is the brine referenced in Attachment O. It is / will be used in closed loop cooling systems for both drying lines. Were we to have loss of containment in the existing system, the spilled brine would drain to a trench the flows to a process sewer and from there to the site WWTP. The design of the new system will include similar provisions to keep any spilled brine from reaching the ground or storm water drains.

I will provide a more detailed response to you after I have finished my review.

Regards,

Mark H. Gaston  
Sr. Process Engineer – Sr. Environmental Consultant  
Kuraray Interlayer Solutions

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**From:** Legg, John C [mailto:John.C.Legg@wv.gov]  
**Sent:** Tuesday, October 27, 2015 12:26 PM  
**To:** Gaston, Mark  
**Cc:** McKeone, Beverly D  
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**Concern:** Please explain to me (or point me to the information in the application, but not the MSDS) about the ThermalStar Heat Transfer Fluid and where/how it is used in the process. Is it used in both

10/22/15

Legg, John C

**From:** Legg, John C  
**Sent:** Thursday, October 22, 2015 12:06 PM  
**To:** Gaston, Mark (Mark.Gaston@kuraray.com)  
**Subject:** R13-1230A - Kuraray America, Inc. (107-00181)  
**Attachments:** 107-00181\_PERM\_R13-1230A.doc

Mark,

Please change in the application Attach I, Emission Units Table:

- Per Kuraray's request in the Process Description: In Line #1, the silo has a relief device, specifically a conservation vent that protects against generation of pressure and vacuum from silo filling and emptying. This CV is shown in the application in Attachment L, in the chemical process Emission Unit Data Sheet (EUDS). Due to the way this relief device was treated in the original 1990 application, it was included in permit R13-1230 as an emission point with an emission limit. With this application for a modification to R13-1230, it is requested that this relief device be deleted as an emission point with emission limits.

Please remove the Line #1 Silo from the Emission Units Table – since the silo is not an emission point!

- For Emission Unit ID B30 and B33: Please change the control device from N/A to B30C and B33C, respectively.

Please change in the application the page entitled: PLOT PLAN LINE #1 or give me the authority to mark through the following word: CONFIDENTIAL

Please explain to me (or point me to the information in the application, but not the MSDS) about the ThermalStar Heat Transfer Fluid and where/how it is used in the process. Is it used in both dryers? Where is the propylene glycol leaked to (at a rate of 0.4 ton/yr)? Inside or outside the building? Just general information about the process, more than I have now. Is this material called Brine, i.e., closed loop brine system discussed in Attachment O/45CSR21 Section 37?

John Legg

used 10/19-23/15 **BACKGROUND INFO**

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Control Device
B30	B30	Drying System	1990	B30 Baghouse
B31A	Closed Loop	Conveying – to storage	1990	None
B31	B31	Storage System	1990	None
B32A	B32A	Rework System	1990	None
B32C	Inside Vent	Drying Feed System	1990	None
B32D	Closed Loop	Conveying – to loading	1990	None
B50A	B50A-1, B50A-2, B50A-3, B50A-4	Exhaust System	1985	None
B52A	Inside Vent	Maintenance Parts Washer	Pre-1970	None
B53A, B53B1, B53B2	B53A, B53B	Gas Heating/HVAC	1975	None
B53C	Inside Vent	Hot Water Heater	1975	None
B54	Inside Vent	Physical Process Parts Cleaner	1995	None
B55	B55	Oven Exhaust Fan	2004	None
B72B	B72B	Raw Material Tank	Pre-1970	None
B74	B74-1, B74-2, B74-3, B74-4, B74-5, B74-6, B74-7, B74-8	Climate Control System	1980 to 1990	None

**1.2. Active R13, R14, and R19 Permits**

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-1230	April 23, 1990
R13-2380D	March 27, 2009
<b>R13-2380E</b>	<b>August 11, 2014</b>
R13-2617C	July 13, 2007

- 4.1.54. One nitrogen sparge and one reactor charge may be vented to each operating scrubber, equipment ID No.'s B08A and B08B, at any one time. [45CSR13, R13-2380, 4.1.54]
- 4.1.65. If one of the scrubbers should malfunction, or for any reason be rendered ineffective, all on-line reactors shall be vented through the remaining functional scrubber. Records of malfunctions shall be kept in accordance 4.4.2. [45CSR13, R13-2380, 4.4.4]
- 4.1.76. If both scrubbers should malfunction, or for any reason be rendered ineffective, the batches in progress shall be allowed to finish as long as the total unabated butyraldehyde emissions per scrubber remain less than 28 pounds per hour. The problem(s) with at least one of the malfunctioning scrubbers must be corrected before polyvinylbutyral (PVB) resin reactor batch operations can resume. [45CSR13, R13-2380, 4.1.65]
- 4.1.87. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. These provisions shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (B01, B01A, B01B, B01C, B30, B31, and B32A) [45CSR13, R13-2380, 4.1.76; 45CSR§§7-3.1 and 3.2]
- 4.1.98. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable. [45CSR13, R13-2380, 4.1.87; 45CSR§7-5.1]
- 4.1.109. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. [45CSR13, R13-2380, 4.1.98; 45CSR§7-9.1]
- 4.1.140. The permittee shall comply with all applicable requirements of the "MON MACT" (40 C.F.R. 63, Subpart FFFF; 40 C.F.R. §63.2435) according to the Group designations below:
- a. MCPU-1, PVA Dissolving
    - 1. Group 2 batch process vents: B01A, B01B, B01C, B02A, B02B, and B02C.
    - 2. Maintenance wastewater stream
  - b. MCPU-2, PVA Reaction
    - 1. Group 1 batch process vents: B08A and B08B.
    - 2. Maintenance wastewater stream
    - 3. Process wastewater stream

[45CSR13, R13-2380, 4.1.109]

- 4.1.198. The permittee must determine the annual average concentration and annual average flowrate for wastewater streams for MCPU-1 and MCPU-2. [45CSR13, R13-2380, 4.1.187; 45CSR34; 40 C.F.R. §63.2485(j)]
- 4.1.2019. For MCPU-1 and MCPU-2, the permittee shall prepare a description of maintenance procedures for management of wastewaters generated from the emptying and purging of equipment in the process during temporary shutdowns for inspections, maintenance, and repair (i.e., a maintenance-turnaround) and during periods which are not shutdowns (i.e. routine maintenance). The descriptions shall:
- a. Specify the process equipment or maintenance tasks that are anticipated to create wastewater during maintenance activities.
  - b. Specify the procedures that will be followed to properly manage the wastewater and control organic HAP emissions to the atmosphere; and
  - c. Specify the procedures to be followed when clearing materials from process equipment.
  - d. The permittee shall modify and update the information required by 4.1.2019.a through 4.1.2019.c as needed following each maintenance procedure based on the actions taken and the wastewaters generated in the preceding maintenance procedure.
  - e. The permittee shall incorporate the procedures described in this section as part of the startup, shutdown, and malfunction plan.

[45CSR13, R13-2380, 4.1.1918; 45CSR34; 40 C.F.R. §§63.105(b), (c), and (d)]

- 4.1.240. Emissions from the permitted process shall not exceed the following hourly and annual limitations:

Emission Source	Particulate Matter	
	lb/hr	ton/yr
Baghouse (B30)	1.0	4.38
Storage Silo (B31)	0.097	0.21
TOTAL	1.097	4.59

Compliance with the above hourly particulate matter emission limits shall demonstrate compliance with the less stringent 45CSR§7-4.1 hourly particulate matter emission limits for the B30 and B31.

[45CSR13, R13-1230, A.1; 45CSR§7-4.1]

- 4.1.221. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified as follows:

Emission Point	45CSR7 Hourly Particulate Emission Limit pph
B32A	9.0

[45CSR§7-4.1.]

- d. Record pounds of PVA received and unloaded.
- e. Record batches of PVA slurry prepared each day.
- f. Calculate daily emissions of particulate, methanol, and VOC.
- g. Calculate rolling 365-day sums for emissions of particulate, methanol, and VOC.
- h. Calculate the 365-day sums at least monthly.

**[45CSR13, R13-2380, 4.4.11; 45CSR34; 40 C.F.R. §63.2525(e)(4)]**

- 4.4.9. For MCPU-1 and MCPU-2 Maintenance Wastewater Streams, the permittee shall maintain a record of the information required in Section 4.1.2019 as part of the start-up, shutdown, and malfunction plan required under 40 C.F.R. §63.6(e)(3) of Subpart A. **[45CSR13, R13-2380, 4.4.12; 45CSR34; 40 C.F.R. §63.105(e)]**
- 4.4.10. For MCPU-2 Process Wastewater Streams, the permittee shall keep in a readily accessible location the records specified below:
- a. Process unit identification and description of the process unit.
  - b. Stream identification code.
  - c. Concentration of Methanol in parts per million, by weight. Include documentation of the methodology used to determine concentration.
  - d. Flow rate in liter per minute.

**[45CSR13, R13-2380, 4.4.13; 45CSR34; 40 C.F.R. §63.147(b)(8)]**

- 4.4.11. For MCPU-2 Process Wastewater Streams, if the permittee uses process knowledge to determine the annual average concentration of a wastewater stream as specified in 40 C.F.R. §63.144(b)(3) and/or uses process knowledge to determine the annual average flow rate as specified in 40 C.F.R. §63.144(c)(1), and determines that the wastewater stream is not a Group 1 wastewater stream, the permittee shall keep in a readily accessible location the documentation of how process knowledge was used to determine the annual average concentration and/or the annual average flow rate of the wastewater stream. **[45CSR13, R13-2380, 4.4.14; 45CSR34; 40 C.F.R. §63.147(f)]**
- 4.4.12. The permittee shall maintain maintenance records for emission points B30 and B54 relating to the failure and/or repair of air pollution control devices and fugitive emissions control systems. Such records shall contain, at a minimum, the equipment ID number, a brief description of the equipment, the date of failure and/or repair, the nature of the problem, actions taken, and the name or initials of the person making the record entry. In the event of air pollution control equipment, fugitive emissions control system, or system failure, these records shall document the permittee's effort to maintain proper and effective operation of such equipment and/or systems. Records shall be maintained on site. Certified records, signed by a Responsible Official or an Authorized Representative shall be made available to the Secretary or a duly authorized representative upon request. **[45CSR§30-5.1.c.]**

6.1.2.5. In the event the facility-wide RACM plan is modified to delete an existing emission source, and any associated pollution control equipment, due to the source being permanently removed from service, or reassigned to service not subject to the requirements of 45CSR§21-40, the MTE shall be recalculated to demonstrate that the 90% facility-wide VOC reduction requirement set forth in Section 6.1.2.1. of this permit is still being met. In the event such a modification results in the site-wide aggregate hourly and annual emissions reduction being recalculated to a rate less than 90%, the RACM plan shall be revised to include all new and/or modified sources and their associated control technologies constructed on or after May 01, 1996, in order to meet the requirements set forth in Section 6.1.2.1. of this permit.

6.1.2.6. In the event the Condensation Reactors B8-1 through B8-8 are subject to the New Source Performance Standards (NSPS) of 40CFR60, the National Emission Standards for Hazardous Air Pollutants (NESHAP) of 40CFR61, or the Maximum Achievable Control Technology (MACT) standards of 40CFR63, then compliance with such requirements as defined in the affected 45CSR13 permit shall demonstrate compliance with the RACT requirements set forth in this permit.

[45CSR13, R13-2380 (Condition 5.1.2)]

## 6.2. Monitoring Requirements

45CSR§21-40.3.a.2 → 6.2.1. The permittee shall implement and maintain leak detection and repair (LDAR) programs for the reduction of fugitive VOC emissions in all manufacturing process units subject to 45CSR§21-40 producing a product or products intermediate or final, in excess of 1,000 megagrams (1,100 tons) per year in accordance with the applicable methods and criteria of 45CSR§21-37 or alternate procedures approved by the Director. Procedures approved by the Director, 40CFR60, Subpart VV, 40CFR61, Subpart V, 40CFR63, Subpart H, 40CFR63, Subpart TT, 40CFR63, Subpart UU, 40CFR65, Subpart F, and 40CFR265, Subpart CC. This requirement shall apply to the ~~Condensation Reactors B8-1 through B8-8~~ <sup>VOC emitting equipment in Polyvinyl Butyral</sup> irrespective of whether or not such units produce as intermediates or final products, substances on the lists contained with 40CFR60, 40CFR61, or 40CFR63.

[45CSR13, R13-2380 (Condition 5.2.1)]

45CSR§21-40.3.a.2

6.2.2. In the event a source and associated emission point from the Condensation Reactors B8-1 through B8-8 are subject to the MACT standards of 40CFR63, then compliance with any applicable LDAR program set forth by the MACT and identified in the affected 45CSR13 permit shall demonstrate compliance with the monitoring requirements set forth in this permit.

[45CSR13, R13-2380 (Condition 5.2.2)]

## 6.3. Testing Requirements

6.3.1. Manufacturing process units may be exempted upon written request of the permittee to the Director. Exempted units are exempted from the frequency of testing as described in 45CSR§21-37, however, LDAR testing of this unit or certification of emission using approved fugitive emission factors will be required every three years, or upon request by the Director or his duly authorized representative. Waiver or scheduling of LDAR testing every three years may be granted by the Director if written request and justification are submitted by the permittee. Units exempted from testing which may be required under any other applicable State or Federal regulations, orders, or permits. The Director may periodically require verifications by the permittee that maintenance and repair procedures associated with approved exemptions are continued and practiced.

~~[45CSR13, R13-2380 (Condition 5.3.1)]~~

45CSR§21-40.3.a.2  
VOC emitting equipment in Polyvinyl Butyral  
6.3.2. In the event a source and associated emission from the Condensation Reactors B8-1 through B8-8 are subject to the MACT standards of 40CFR63, then compliance with the applicable LDAR testing requirements set forth by the MACT and identified in the affected 45CSR13 permit shall demonstrate compliance with the LDAR testing requirements set forth in this permit.

[45CSR13, R13-2380 (Condition 5.3.2)]

**1.0. Emission Units**

<b>Emission Point ID</b>	<b>Control Device</b>	<b>Emission Unit ID</b>	<b>Emission Unit Description</b>
B01	None	B01	Unloading System
B01A, B01B, B01C	None	B01A, B01B, B01C	Solids Handling System
B02A, B02B, B02C	None	B02	Solution Processing System
B03A	None	B03A	Additive System
B03B	None	B03B	Waste Processing Aid Drum Station
B03C	None	B03C	Additive System
Inside Vent	None	B03E	Acid Storage Tank
		B03F	Acid Storage Tank
		B03G	Additive System
		B03H	Additive System
		B03I	Additive System
B05	None	B05	Tankcar Unloading System
B06A	None	B06A	Storage Tank
B06B	None	B06B	Storage Tank
B08A or B08B	B08A or B08B Scrubber	B08A	Reactor System
B07A	None		
B08A or B08B	B08A or B08B Scrubber	B08B	Reactor System
B07B	None		
B09A	None	B09A	Extrusion Line
B09B and B09C	None	B09B	Dryer
B10A-1 to B10A-2	None	B10A	Feed System
B09A and B11A	None	B10B	Vacuum System
B11A	None	B11A	Extrusion Line
B11B and B11C	None	B11B	Dryer
B09A or B11A	None	B12	Extruder System

<b>Emission Point ID</b>	<b>Control Device</b>	<b>Emission Unit ID</b>	<b>Emission Unit Description</b>
Inside Vent	None	B12A	Feed System
		B12B-1	Additive System
		B12B-2	Additive System
		B12C	Ink System
		B12E	Waste Drum Filling Station
B12F	None	B12F	Vapor Condenser
B17	B17C Scrubber	B15	Ink Mix Tanks
		B16	Equipment Cleaning
		B17A	Slot Hoods
		B17B	Inspection Room Booth
		B17C	Prep Room Hood
		B17D	Press Canopy
		B17F	Sheet Path Canopy
		B17G	Sheet Conveying
		B17H	Web Cleaners
		B21	Steam-Heated Dryer
B19	None	B19	Waste Drum Filling Station
B24	None	B24A	Agitated Sump
		B24B-1	Transfer Belt
		B24B-2	Transfer Belt
B25	None	B25	Biosump System
Inside Vent	None	B26-1	Slurry Tank
		B26-2	Slurry Tank
		B26-3	Slurry Tank
		B26-4	Slurry Tank
		B26-5	Slurry Tank
		B26-6	Slurry Tank
		B26-7	Slurry Tank
		B26-8	Slurry Tank
B26-9	None	B26-9	Slurry Tank
B26-10	None	B26-10	Slurry Tank
B26-11	None	B26-11	Slurry Tank

<b>Emission Point ID</b>	<b>Control Device</b>	<b>Emission Unit ID</b>	<b>Emission Unit Description</b>
B27A	None	B27A	Slurry Tank
B27B	None	B27B	Slurry Tank
B27C-1, B27C-2	None	B27C	Slurry Tanks
B27D-1	None	B27D-1	Process Tank
B27D-2	None	B27D-2	Process Tank
B27D-3	None	B27D-3	Process Tank
B27D-4	None	B27D-4	Process Tank
B27D-5	None	B27D-5	Process Tank
B27E	None	B27E	Additive Addition Hood
B28A-1, B28A-2	None	B28A	Additive Unload Station
B29A	None	B29A	Ingredient Storage Tank A
B29B	None	B29B	Ingredient Storage Tank B
Inside Vent	None	B29C	Additive Tanks
B30	B30C Baghouse	B30	Drying System
B31	None	B31	Storage System
B32A	None	B32A	Drying Recycle System
Inside Vent	None	B32C	Drying Feed System
B40B-1, B40B-2, B40B-3, B40B-4, B40B-5	None	B40B	Recycle Slurry System
Inside Vent	None	B41	Recycle System
B50A-1, B50A-2, B50A-3, B50A-4	None	B50A	Exhaust System
Inside Vent	None	B51	Autoclave
		B52A	Maintenance Parts Washer
B53A	None	B53A	Heating System – HVAC
B53B	None	B53B	Heating System – HVAC
Inside Vent	None	B53C	Domestic Hot Water Heater
Inside Vent	None	B54	Sandblaster
B55	None	B55	Lab Exhaust Fan
Inside Vent	B60D Baghouse	B60D	Mixing Area Exhaust Fan

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E. I. du Pont de Nemours & Company, Inc. • Polyvinyl Butyral Production (4 of 14)

Emission Point ID	Control Device	Emission Unit ID	Emission Unit Description
B72B	None	B72B	Coolant Tank
B74-1, B74-2, B74-3, B74-4, B74-5, B74-6, B74-7, B74-8	None	B74	Climate Control System

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- 5.1.5. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment. [45CSR§7-5.2.]
- 5.1.6. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures. [45CSR§7-4.12.]
- 5.1.7. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director. [45CSR§7-9.1.]

## 5.2. Monitoring Requirements

- 5.2.1. For the purpose of determining compliance with the opacity limits of 45CSR§§7-3.1 and 3.2 (5.1.2) for emission points B01, B27E, B30, and B32A, the permittee shall conduct opacity monitoring and record keeping for all emission points and equipment subject to an opacity limit under 45CSR7. Monitoring shall be conducted at least once per month with a maximum of forty-five (45) days between consecutive readings. These checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix A, Method 22 during periods of normal operation of emission sources that vent from the referenced emission points for a sufficient time interval to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 45CSR7A within twenty-four (24) hours of the first signs of visible emissions. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within twenty-four (24) hours after the visible emission and the sources are operating at normal conditions. If the permittee cannot conduct visible emission observations for emission point B32A due to weather and/or a limited operating schedule, the permittee shall document in the records required by 5.4.1 the specific reason(s) that visible emission observations could not be conducted for that month. [45CSR§30-5.1.c.]
- 5.2.2. For the purpose of determining compliance with the opacity limits of 45CSR§§7-3.1 and 3.2 (5.1.2) for emission points B01A, B01B, and B31, the permittee shall conduct monthly inspections of the tops of the vessels around the conservation vents to determine if there is an accumulation of particulate which may indicate potential excess emissions from the vessels. If excessive particulate on or around the vessels is observed, the permittee shall conduct a more thorough inspection to determine the source and corrective action shall be taken to reduce the excessive emissions. [45CSR§30-5.1.c.]

### 5.3. Testing Requirements

- 5.3.1. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings, and ladders to comply with generally accepted good safety practices. [45CSR§7-8.1]
- 5.3.2. The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions. [45CSR§7-8.2]

### 5.4. Recordkeeping Requirements

- 5.4.1. Records of the visible emission observations required by 5.2.1 shall be maintained documenting the date and time of each visible emission check, the name of the responsible observer, the results of the check, and, if necessary, all corrective actions taken. These records shall be maintained on-site for a period of no less than five (5) years and made available to the Director or his duly authorized representative upon request. [45CSR§30-5.1.c.]
- 5.4.2. Records of the inspections required by 5.2.2 shall be maintained documenting the date and time of each inspection, the name of the inspector, the results of the inspection, and, if necessary, the cause of excessive emissions and all corrective actions taken. These records shall be maintained on-site for a period of no less than five (5) years and made available to the Director or his duly authorized representative upon request. [45CSR§30-5.1.c]
- 5.4.3. The permittee shall maintain maintenance records for emission points B30, B60D, and B54 relating to the failure and/or repair of air pollution control devices and fugitive emissions control systems. Such records shall contain, at a minimum, the equipment ID number, a brief description of the equipment, the date of failure and/or repair, the nature of the problem, actions taken, and the name or initials of the person making the record entry. In the event of air pollution control equipment, fugitive emissions control system, or system failure, these records shall document the permittee's effort to maintain proper and effective operation of such equipment and/or systems. Records shall be maintained on site for a period of five (5) years. Certified records, signed by a Responsible Official or an Authorized Representative shall be made available to the Secretary or a duly authorized representative upon request. [45CSR§30-5.1.c.]
- 5.4.4. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures as required by 5.1.5 applied at the facility. These records shall be maintained on site for a period of no less than five (5) years. [45CSR§30-5.1.c.]

5.4.5. The permittee shall maintain maintenance records relating to the failure and/or repair of the bag filter and filter systems on the raw material unloading system (B01). These records shall contain, at a minimum, the date of failure and/or repair, the nature of the problem, actions taken, and the name or initials of the person making the record entry. In addition, the permittee shall also maintain records of all blower interlock events that are due to low suction pressure. These records shall contain, at a minimum, the date of the interlock event, the cause of problem, actions taken, and the name or initials of the person making the record entry. All records shall be maintained on site for a period of five (5) years. Certified records, signed by a Responsible Official or an Authorized Representative shall be made available to the Secretary or a duly authorized representative upon request. [45CSR§30-5.1.c]

**5.5. Reporting Requirements**

5.5.1. NA

**5.6. Compliance Plan**

5.6.1. NA

# Fact Sheet

Background  
Info



## For Final Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10700001-2003**  
Plant Identification Number: **10700001**  
Permittee: **E. I. duPont de Nemours & Company, Inc.**  
Facility Name: **Washington Works**  
Business Unit: **Polyvinyl Butyral Production (Part 4 of 14)**  
Mailing Address: **P.O. Box 1217, Washington, WV 26181-1217**

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Physical Location: Washington, Wood County, West Virginia  
UTM Coordinates: 442.27 km Easting • 4,346.57 km Northing • Zone 17  
Directions: Route 68 west from Parkersburg to intersection of Route 892. Continue west on Route 892 with the plant being on the north side about one mile from the intersection of Routes 68 and 892.

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### Facility Description

In the Polyvinyl Butyral Production Unit (Part 4 of 14), polyvinyl butyral (PVB) resin particles and sheeting are manufactured for use in automotive and architectural laminated glass applications. The Polyvinyl Butyral Production Unit has the capability to operate 8,760 hours per year.

Butyraldehyde, one of the two main raw materials, is received by tank car and stored in tanks. The other major raw material, polyvinyl alcohol (PVA) is received by hopper cars and stored in silos. The PVA is then weighed, dissolved in water, and placed in a holdup tank. Butyraldehyde and PVA are fed to reactors where they form polyvinyl butyral (PVB). The polyvinyl butyral, in an aqueous slurry form, is then transferred to either the flake drying or extrusion areas. The PVB that is sent to the flake drying area is dewatered, dried, and then stored in a silo before being loaded for shipment off-site.

The remainder of the PVB from the reactors is combined with a plasticizing agent and fed to extruders for conversion into sheeted product. This extruded sheet is water quenched and dried after extrusion. Extruded PVB sheet is further processed, when required, by feeding the sheet through a printing operation where ink is used to impart a tinted edge to the sheet. This sheet is then dried and inspected prior to being wound on a roll for final shipment to off-site customers.

DuPont Washington Works has divided the Title V Permit Application into the following fourteen separate business units for which each will receive a Title V Permit:

Acrylic Resin Production	Part 1 of 14
Fluoropolymer Production	Part 2 of 14
Acetal Resin Production	Part 3 of 14
Polyvinyl Butyral Production	Part 4 of 14
Nylon Resins Production	Part 5 of 14
Engineering Polymers Compounding Production - East	Part 6 of 14
Engineering Polymers Compounding Production - West	Part 7 of 14
Specialty Compounding Production	Part 8 of 14
Filaments Production	Part 9 of 14
Power and Service Support Facilities	Part 10 of 14
Research and Development (R&D)	Part 11 of 14
Facilities, Construction and Support (FC&S)	Part 12 of 14
Central Laboratory Services	Part 13 of 14
Central Maintenance Services	Part 14 of 14

**Emissions Summary**

<b>Polyvinyl Butyral Production Emissions Summary [Tons per Year]</b>		
<b>Criteria Pollutants</b>	<b>Potential Emissions</b>	<b>2003 Actual Emissions</b>
Carbon Monoxide (CO)	N/A	N/A
Nitrogen Oxides (NO <sub>x</sub> )	N/A	N/A
Particulate Matter (PM <sub>10</sub> )	5.79	4.92
Sulfur Dioxide (SO <sub>2</sub> )	N/A	N/A
Volatile Organic Compounds (VOC)	92.40	45.95

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2003 Actual Emissions</b>
Dimethyl Formamide	15.27	4.03
Methanol	6.63	1.76

*Some of the above HAPs may be counted as PM or VOCs.*

**Title V Program Applicability Basis**

Due to the facility-wide potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year aggregate HAPs, DuPont Washington Works is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

**Legal and Factual Basis for Permit Conditions**

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor sources.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR§21-30	Solvent Metal Cleaning.
	45CSR§21-34	Control of VOC Emissions from Graphic Arts Systems.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart KK	Printing and Publishing MACT
	40 C.F.R. Part 63, Subpart FFFF	Miscellaneous Organic Chemical Manufacturing (MON) MACT.
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances.
State Only:	45CSR4	No objectionable odors.
	45CSR§21-40	Control of VOC Emissions

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-1230	April 23, 1990	NA
R13-1459B	February 28, 2005	NA
R13-2380C	April 18, 2005	NA
CO-R21-97-47	December 3, 1997	NA

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## **Determinations and Justifications**

### ***R13-2380C Requirements***

R13-2380C limits the hourly and annual VOC and MeOH emissions from emission points B09A, B09B, B09C, B11A, B11B, B11C, B08A, B08B, B07A, B07B (4.1.1). To demonstrate compliance with these emission limits, R13-2380C limits the production of polyvinyl butyral resin produced in the reactors B08-1 through B08-8 (4.1.2), limits the production of polyvinyl butyral product extruded on the extruder lines B09 and B11 (4.1.3), and sets operating limitations on the scrubbers B08A and B08B (4.1.5, 4.1.6, 4.1.7, and 4.1.8). To demonstrate compliance with the production limits, the permittee is required to maintain records on a quarterly and annual basis of the monthly production rates for each set of four reactors, Reactors B08-1 through B08-4 and Reactors B08-5 through B08-8, and also monthly production records for each of the extrusion lines B09 and B11 (4.4.1). Example log sheets are provided in Appendix A. The permittee is also required to maintain records of scrubber malfunctions in accordance with 4.4.2 and 4.4.3.

### ***R13-1230 and 45CSR7 Requirements***

#### **R13-1230 Requirements**

R13-1230 limits the hourly and annual particulate matter emission limits for emission points B30 and B31 (5.1.1). There was no method specified in R13-1230 for demonstrating compliance with these emission limits. Since the uncontrolled hourly and annual R13-1230 particulate matter emission limits of 0.097 lb/hr and 0.21 ton/yr for emission point B31 are less than 0.1 lb/hr and 1 ton/yr, emissions from these sources were considered insignificant and monitoring was not added to demonstrate compliance with the hourly and annual emission limits. Although no monitoring was added, 45CSR§7-8.1 provides the Director with the option of requiring performance testing to demonstrate compliance with the hourly particulate emission limits. In addition, the permittee is being required to conduct visible emission observations to demonstrate compliance with the visible emission limits of 45CSR§7-3.1 and these visible emission observations could be used to indicate a problem resulting in excess particulate emissions.

Emissions from the B30 drying system are controlled by a mechanical collector which is part of the drying system followed by a baghouse to control emissions from the drying system. The mechanical collector recovers the particulate and recycles it within the dryer system and the air stream exiting the mechanical collector is then routed to the baghouse which has a collection and control efficiency in excess of 99%. Since the particulate matter emission limits of 1.0 lb/hr and 4.38 ton/year are based on the baghouse being operated and maintained to provide a 99% collection and control efficiency, a requirement to keep maintenance records of the baghouse was added through 45CSR§30-5.1.c. These records shall be maintained on site for a period of five years and must contain, at a minimum, the equipment ID number, a brief description of the equipment, the date of failure and/or repair, the nature of the problem, actions taken, the name or initials of the person making the record entry, and the permittee's effort to maintain proper and effective operation of the baghouse.

45CSR7 Requirements

Emissions from B01, B01A, B01B, B27E, B30, B31, and B32A are required by 45CSR§7-3.1 to be maintained at or below twenty percent opacity. Monthly visible emission observations were added through 45CSR§30-5.1.c to demonstrate compliance with this limit for emission points B01, B27E, B30, and B32A. These visible emission observations will be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix A, Method 22. If visible emissions are identified, then a 45CSR7A evaluation is required within 24 hours unless the problem is corrected within that time frame. Records of each visible emission check conducted are required to be maintained for a period of five (5) years. If the permittee cannot conduct visible emission observations for emission point B32A due to weather and/or a limited operating schedule, the permittee is required to document the reason(s) that the visible emission observations could not be conducted for that month in the records required under 5.4.1.

Emission points B01A, B01B, and B31 are conservation vents mounted at the top of vessels. Because of the location of the vents, the intermittent frequency of venting, and the nature of the emissions, the permittee proposed monthly inspections of the vessel tops around the conservation vents to determine if there is an accumulation of particulate which may indicate potential excess emissions from the vessels. If excessive particulate on or around the vessels is observed, the permittee must conduct a more thorough inspection to determine the source and corrective actions should be taken to reduce the excess emissions. These requirements were added through 45CSR§30-5.1.c.

Emission points B30 and B31 are subject to the particulate matter emission limits of 45CSR§7-4.1. Emission limits are calculated from Table 45-7A based on the maximum hourly process weight rate for the appropriate source category. Comparison of the emission limits indicate that compliance with the hourly particulate matter emission limits from 5.1.1 can demonstrate compliance with the less stringent 45CSR§7-4.1 hourly particulate matter emission limits for B30 and B31.

Emission points B01, B01A, B01B, B27E, and B32A are also subject to 45CSR§7-4.1, but do not have R13-1230 hourly particulate emission limits. Since the maximum hourly uncontrolled emission rates of particulate matter for B01A, B01B, B27E, and B32A are less than 1 lb/hr and are less than the 45CSR§7-4.1 hourly emission limits, emissions from these sources were considered insignificant and monitoring was not added to demonstrate compliance. Although no monitoring was added, 45CSR§7-8.1 provides the Director with the option of requiring performance testing to demonstrate compliance with the 45CSR§7-4.1 hourly emission limits.

The raw material unloading system, emission point B01, has a 45CSR§7-4.1 hourly particulate matter emission limit of 15.7 lb/hr and a maximum hourly uncontrolled particulate matter emission rate of 9.7 lb/hr. It is used to unload raw material from a transport vehicle and vacuum transfer the material to a storage location. This vacuum transfer operation has a bag filter which is used to separate the particulate from the carrier gas stream. The gas stream from the bag filter then goes to the blower to provide the vacuum for material transfer. Between the bag filter and the blower, there is a small filter unit that protects the blower from particulate matter. The suction pressure on the blower is monitored at all times when the blower on the raw material unloading system is in operation and transferring material. If the suction pressure gets too low, the blower has an interlock to shut down and stop the transfer of material. To demonstrate compliance with the 45CSR7-4.1 hourly particulate matter emission limit, the permittee will be required to document all interlock events for the blower and to keep maintenance records of the bag filter and filter. In addition, 45CSR§7-8.1 provides the Director with the option of requiring performance testing.

The following table compares the R13-1230 hourly particulate emission limits, or the maximum actual hourly emissions if there was no R13-1230 hourly particulate emission limit, with the 45CSR§7-4.1 allowable particulate emission limits.

Emission Point	45CSR§7-4.1 PM Emission Limit lb/hr	R13-1230 PM Emission Limits lb/hr	Maximum Actual Emissions lb/hr
B01	15.7	---	9.7
B01A	15.7	---	0.5

Emission Point	45CSR§7-4.1 PM Emission Limit lb/hr	R13-1230 PM Emission Limits lb/hr	Maximum Actual Emissions lb/hr
B01B	15.7	---	0.5
B27E	0.475	---	0.396
B30	4.2	1.0	NA
B31	4.2	0.097	NA
B32A	9.0	---	0.9

Since emissions from the Mixing Area Exhaust Hood (B60D) and the Sandblaster (B54) vent into the building and do not have an exterior emission point, they are subject to the fugitive emission requirements of 45CSR§7-5.1. 45CSR§7-5.1 requires the emission units to be equipped with a system which may include, but not be limited to, process equipment design, control equipment design, or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. In order to demonstrate compliance with this requirement, the permittee will be required to maintain records as specified in 5.4.2 of the types of fugitive particulate capture and/or suppression systems used, the times these systems were inoperable, and the corrective actions taken to repair these systems.

In order to demonstrate compliance with the fugitive particulate matter requirements of 45CSR§7-5.2 (5.1.5), the permittee will be required to maintain records in accordance with 5.4.3.

***R13-1459B, 40 C.F.R. 63, Subpart KK, and 45CSR§21-34 Requirements***

**R13-1459B Requirements**

6.1.1 limits the maximum hourly and annual production rate of printed Polyvinyl Butyral (PVB). In order to demonstrate compliance with these maximum hourly and annual production rates, the permittee is required by 6.4.1 to maintain daily, monthly, and annual records of printed Polyvinyl Butyral (PVB) production.

6.1.2 limits the hourly and annual dimethyl formamide (DMF) emissions from emission point B17. The hourly and annual DMF emission limits were based on the maximum hourly and annual production rates of printed Polyvinyl Butyral (PVB), the ink usage, the control efficiency of the scrubber B17-C, and the capture efficiency of the printing room. In order to demonstrate compliance with the emission limits, the permittee is required to maintain daily, monthly, and annual production records of printed Polyvinyl Butyral (PVB) and daily records of ink usage as specified in 6.4.1. In addition, the permittee is required to maintain and operate the scrubber B17-C in accordance with the minimum flow rates specified in 6.1.3 and maintain a minimum printing room differential pressure to ensure a permanent total enclosure as specified in 6.1.4. Continuous monitoring and recordkeeping of the average air and water flow rates to the scrubber nozzles and the printing room differential pressure are required in 6.2.1 and 6.4.2. The permittee is also required to maintain maintenance and malfunction records of the scrubber B17-C in accordance with 6.4.3 and 6.4.4.

**40 C.F.R. 63, Subpart KK Requirements**

40 C.F.R. §63.825(b) requires the permittee to limit emissions to no more than five percent of the organic HAP applied for the month. To demonstrate compliance with this limit, the permittee had the option of operating a capture system and control device and demonstrating an overall organic HAP control efficiency of at least 95 percent for each month. 40 C.F.R. §63.825(b)(7) listed procedures for both solvent recovery devices and oxidizers. DuPont determined that neither control option was suitable for their system and requested the use of an alternative monitoring method in accordance with 40 C.F.R. §63.8(f). The alternative monitoring method was approved on July 1, 1999 in a letter from Bernard E. Turlinkski, Associate Director for the Air Protection Division of USEPA, Region III to Robert L. Ritchey, Senior Environmental Control Consultant for DuPont Washington Works.

The following excerpt is from the July 1, 1999 letter and states the basis for the approval of the alternative monitoring plan:

“This letter responds to your April 8, 1999 letter transmitting a site-specific performance test plan for a control device installed to meet the requirements of the Printing MACT. Although the letter did not request the approval for use of an alternative monitoring (operating) parameter, subsequent discussions with EPA, WVDEP, and DuPont Washington Works have revealed that the control device chosen for compliance is not specifically addressed in the Printing MACT. As per Guidance on How to Review and Issue Clean Air Act Applicability Determinations and Alternative Monitoring in a March 5, 1999 EPA memorandum, authorization has been delegated to EPA Regional Offices to approve alternative monitoring plans.

Upon reviewing the enclosure of your April 8, 1999 letter entitled “Performance Test Plan for the Water Scrubber on the Polyvinyl Butyral Printing Process” with EPA Office of Air Quality Planning and Standards (OAQPS), EPA Region III has determined the following:

-40 C.F.R. §63.825(b)(7) establishes an emission standard to operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95 percent for each month. The submitted test protocol intends to meet the monthly 95 percent overall control efficiency.

-The submitted test protocol for the water scrubber meets the requirements of 40 C.F.R. §63.827(d)(1), which establishes an initial performance test for destruction efficiency of an oxidizer using EPA approved reference test methods.

-The submitted test protocol for the water scrubber meets the requirements of 40 C.F.R. §63.827(e)(1), which requires permanent total enclosures to be confirmed by Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure.

-40 C.F.R. §63.827(d)(3) requires an operating parameter for the oxidizer be established during the initial performance test. Operating parameters for oxidizers are minimum combustion temperatures that demonstrate continuous compliance with an applicable emission standard. As an alternative, the submitted test protocol for the water scrubber will establish an air flow versus water flow curve as the operating parameter required to demonstrate continuous compliance with the Printing MACT.

-The Administrator must approve the use of an alternative monitoring method not specified in a relevant standard as required in 40 C.F.R. §63.8(f).

As per delegation, EPA Region III approves the alternative monitoring method cited in the site-specific performance test plan to adequately demonstrate continuous compliance with the Printing MACT emission standard in 40 C.F.R. §63.825(b)(7).”

Initial performance tests required by 40 C.F.R. §63.825(d)(1) to demonstrate compliance with the overall organic HAP control efficiency from 40 C.F.R. §63.825(b)(7) were conducted on July 27 and 29, 1999. These performance tests determined control device and capture system operating parameters to be used for demonstrating continuing compliance.

Testing to confirm that the capture system is a permanent total enclosure was conducted using Procedure T (Method 204) - “Criteria for and Verification of a Permanent or Temporary Total Enclosure.” Procedure T was used to demonstrate that the capture system is a permanent total enclosure and to establish the minimum differential pressure required to maintain 100% capture.

Performance testing for control efficiency of the scrubber was conducted using EPA Method 18. The performance testing data from Method 18 was used to establish the minimum air and water flows to each nozzle that are required to maintain 95% control efficiency.

In accordance with Subpart KK, Dupont is required to monitor compliance by the following: 1) Continuously record three-hour rolling average water flow to each of the scrubber nozzles to assure that water flow to each nozzle remains above the minimum established value; 2) Continuously record three-hour rolling average air flow to each of the scrubber nozzles to assure that the air flow to each nozzle remains above the minimum established value; 3) Continuously record printing area differential pressure to assure that it remains above the minimum established value necessary to maintain 100% capture.

The permittee is also required to follow recommended maintenance procedures for scrubber B17-C and to inspect the scrubber (including the nozzles) annually, at a minimum. All maintenance records are required to be maintained in accordance with 40 C.F.R. §63.10(b)(1). In addition to maintenance records, the permittee is also required to maintain records of scrubber B-17C malfunctions.

40 C.F.R. 63, Subpart KK requires a summary report to be submitted on a semi-annual basis containing all of the reports required under 6.5.1.

#### 45CSR§21-34 Requirements

45CSR§21-34 applies to any packaging rotogravure, publication rotogravure, or flexographic printing press at any facility whose maximum theoretical emissions of volatile organic compound (VOC) without control devices from all printing presses are greater than or equal to 100 tons per year. In November 1993, DuPont certified that emissions from the printing press operation are below the 100 tons per year applicability threshold. In order to demonstrate that annual VOC emissions are below the 100 tons per year threshold, the permittee is required to maintain records and submit reports in accordance with 6.4.5 and 6.5.2. 45CSR§21-34.7.a.2 only requires that records be maintained for a period of three (3) years, but this requirement was changed to five (5) years.

#### **40 C.F.R. 63, Subpart FFFF Requirements**

The permittee is subject to 40 C.F.R. 63, Subpart FFFF - "National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing" and must comply with all applicable requirements no later than November 10, 2006. The Initial Notification was due on March 9, 2004 and was received on March 4, 2004. The permittee must submit a precompliance report and a complete application for a significant Title V permit modification to include the specific requirements of 40 C.F.R. 63, Subpart FFFF in the operating permit on or before May 10, 2006.

#### **45CSR§21-30 Requirements**

The Metal Parts Degreaser (B52A) is subject to the cold cleaning provisions of 45CSR§21-30. All applicable testing, recordkeeping, and reporting are the same as required by Section 30 with the exception that records shall be maintained for a period of five (5) years instead of two (2).

#### **45CSR21§-40 Requirements**

The permittee is subject to the State-Enforceable only conditions of Consent Order CO-R21-97-47. DuPont is currently working with the DAQ to incorporate these conditions into one or more permits issued under 45CSR13 and have Consent Order CO-R21-97-47 dissolved. Since the conditions of CO-R21-97-47 not only include Polyvinyl Butyral Production (Part 4 of 14), but also, Fluoropolymers Production (Part 2 of 14), Acetal Resin Production (Part 3 of 14), and Research and Development (Part 11 of 14), they will become part of a site-wide Title V permit and will not be included in any of the individual Business Unit's Title V permits.

#### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 40 C.F.R. 60, Subpart K - "Standards of Performance For Storage Vessels For Petroleum Liquids or 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 Polyvinyl Butyral Production Area.
- 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 Polyvinyl Butyral Production Area.

- 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 Polyvinyl Butyral Production Area constructed after July 23, 1984 with a design capacity equal to or greater than 75 cubic meters (m<sup>3</sup>).
- d. 40 C.F.R. 60, Subpart VV - "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry." The Polyvinyl Butyral Production Area 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 Polyvinyl Butyral Production Area does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
- f. 40 C.F.R. 60, Subpart HHH - "Standards of Performance for Synthetic Fiber Production Facilities." The Polyvinyl Butyral Production Area does not operate a solvent-spun synthetic fiber process as defined by 40 C.F.R. §60.601.
- g. 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 Polyvinyl Butyral Production Area utilizes batch processes which in accordance with 40 C.F.R. §60.700(c)(1) are not subject to this regulation.
- h. 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 Polyvinyl Butyral Production Area.
- i. 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).
- j. 40 C.F.R. 63, Subpart JJJ - "National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins." The Polyvinyl Butyral Production Area does not produce the materials listed in 40 C.F.R. §63.1310.
- k. 40 C.F.R. 63, Subpart MMMM - "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products." There is a printing operation in the Polyvinyl Butyral business unit where a solid web of vinyl sheeting is printed with an ink containing a HAP as defined in 40 C.F.R. §63.4371. However, this operation is subject to 40 C.F.R. 63, Subpart KK - "National Emission Standards for the Printing and Publishing Industry."
- l. 40 C.F.R. 63, Subpart OOOO - "National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles." There is a printing operation in the Polyvinyl Butyral business unit where a solid web of vinyl sheeting is printed with an ink containing a HAP as defined in 40 C.F.R. §63.4371. However, this operation is subject to 40 C.F.R. 63, Subpart KK - "National Emission Standards for the Printing and Publishing Industry."
- m. 40 C.F.R. 63, Subpart PPPP - "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products." The Polyvinyl Butyral Production Area does not produce an intermediate or final product that meets the definition of "surface coated" plastic part.

- n. 40 C.F.R. 63, Subpart WWWW - "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production." The Polyvinyl Butyral Production Area 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.
- o. 40 C.F.R. 63, Subpart HHHHH - "National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing." The coatings manufactured in the Polyvinyl Butyral Production Area are part of an affected source regulated under 40 C.F.R. 63, Subpart KK and therefore in accordance with 40 C.F.R. §63.7985(a)(4) are not subject to 40 C.F.R. 63, Subpart HHHHH.
- p. 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 Polyvinyl Butyral Production Area does not conduct motor vehicle maintenance involving CFCs on site.
- q. 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 Polyvinyl Butyral Production Area does not use, manufacture, nor distribute these materials.
- r. 45CSR2 - "To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers." The Polyvinyl Butyral Production Area does not contain any fuel burning units regulated under this rule.
- s. 45CSR§6-4 - "To Prevent and Control Air Pollution from Combustion of Refuse: Emission Standards for Incinerators and Incineration." The Polyvinyl Butyral Production Area does not operate any incinerators as defined by 45CSR§6-2.8.
- t. 45CSR10 - "To Prevent and Control Air Pollution from the Emission of Sulfur Oxides." The Polyvinyl Butyral Production Area does not have emission sources of sulfur oxides subject to this rule.
- u. 45CSR16 - "Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60." The Polyvinyl Butyral Production Area is not subject to any requirements under 40 C.F.R. 60.
- v. 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 Polyvinyl Butyral Production Area is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.
- w. 45CSR27 - "To Prevent and Control the Emission of Toxic Air Pollutants." The Polyvinyl Butyral Production Area does not have emission sources of toxic air pollutants as listed in 45CSR27.

**Request for Variances or Alternatives**

None

**Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

**Comment Period**

Beginning Date: May 2, 2005  
Ending Date: June 1, 2005

All written comments should be addressed to the following individual and office:

Carrie McCumbers  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304

**Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Point of Contact**

Carrie McCumbers  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. (1226) • Fax: 304/926-0478

**Response to Comments (Statement of Basis)**

Rose Nino of EPA, Region III e-mailed two "unofficial" comments on May 23, 2005. These comments were discussed in a phone conversation on May 24, 2005 and were resolved without making any changes to the permit. Rose Nino sent a follow-up e-mail on May 24, 2005 which stated that all the comments had been verbally resolved and that we may proceed with issuance of the permit. No other comments were received.

STATE OF WEST VIRGINIA

R13-1230  
OLD Permit

AIR POLLUTION CONTROL COMMISSION  
PERMIT TO CONSTRUCT, MODIFY, OR RELOCATE  
STATIONARY SOURCES OF AIR POLLUTANTS

PERMIT NO.: R13-1230

DATE: April 23, 1990

IN ACCORDANCE WITH THE WEST VIRGINIA AIR POLLUTION CONTROL LAW (§16-20) AND ADMINISTRATIVE REGULATIONS PROMULGATED THEREUNDER, THE FOLLOWING PERMITTEE IS AUTHORIZED TO CONSTRUCT THE SUBJECT FACILITY IN ACCORDANCE WITH THIS PERMIT.

Name of Permittee: E. I. DuPont de Nemours & Company, Inc.

Name of Facility: Washington Works

Mailing Address: Post Office Box 1217

Parkersburg, West Virginia 26102

Nearest City or Town: Parkersburg

County: Wood

Directions to Exact Location: North of State Route 893 three (3) miles west of intersection with State Route 68.

Type of Facility or Modification: Construction of fluidized bed dryer system to dry polyvinyl butyral flakes.

SPECIFIC REQUIREMENTS

(A) IN ACCORDANCE WITH THE PERMIT APPLICATION AND ITS AMENDMENTS THIS PERMIT IS LIMITED AS FOLLOWS:

Emissions from the permitted process shall not exceed the following hourly and annual limitations:

	<u>lb/hr</u>	<u>ton/vr</u>	
Baghouse	1.0		4.38
Storage Silo	<u>0.097</u>	<u>.21</u>	
TOTAL:	1.097		4.59

GENERAL REQUIREMENTS

(1) Possession of this permit does not relieve any person of the responsibility of complying with any and all applicable rules or regulations of the Commission or any other governmental agency.

(2) The permitted facility must be constructed and operated in accordance with information filed in WVAPCC Permit Application No. 1230. The Director may cancel or suspend a permit if the plans and specifications upon which the approval was based are not adhered to.

(3) At such reasonable time(s) as the Director may designate, the permittee shall conduct or have conducted stack tests to determine compliance with the emission limitations established in the permit application and/or applicable WVAPCC regulations. Tests shall be conducted in such a manner as the Director may specify or approve and must be filed in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack test. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment, and the required safety equipment such as scaffolding, railings, and ladders to comply with general accepted good safety practices. For any tests to be conducted by the permittee, a test protocol must be submitted to the WVAPCC by the permittee at least thirty (30) days prior to the test and must be approved by the Director. The Director must be notified at least fifteen (15) days in advance of the actual dates and times during which the test will be conducted.

(4) THIS PERMIT IS NON-TRANSFERABLE.

ISSUED BY: \_\_\_\_\_

G. DALE FARLEY  
DIRECTOR

DATE: \_\_\_\_\_

Legg, John C

---

**From:** Legg, John C  
**Sent:** Wednesday, October 14, 2015 4:22 PM  
**To:** 'Gaston, Mark'  
**Cc:** McKeone, Beverly D  
**Subject:** RE: R13-1230A - Application Complete Letter: Kuraray Washington Works (107-00181)  
**Attachments:** Complete Letter signed.pdf; 107-00001\_PERM\_13-1230.pdf; NSR Permit Rev 2-1-13.doc

10/14/15

Mark,

Thank you for your call today (10/14/15).

I have allowed next week (10/19-23/15) for me to start and finish the work on your draft permit.

The sooner a draft permit is developed the sooner I can place an advertisement in the newspaper to open up a 30 day public comment period.

If you want to take the existing permit and mark it up with suggested changes, and sent it back to me, I will consider your suggestions, but do so quickly.

[The old permit is terribly old and out of date, so you don't have very much to base your suggestions on. I have also attached the document that is the DAQ's current permit format. The new requirements will go into Section 4 of this document. Other companies have provided the DAQ with their suggested draft permits, but they have had better starting permits than you do – so this may not be a good idea. Bottom line: The ideal of submitting a draft permit is to speed things up: not to slow things down.]

Once I come up with the draft permit, I can give you two to three days to review and comment on the draft before going to legal notice. If we can agree on a draft, that would be a good thing. Kuraray can also comment during the public comment period, but that does not mean the suggested changes would be adopted. Also, if the public should comment on the draft permit, the DAQ may not be able to change the draft permit without re-running the legal ad and opening another 30 day public comment period.

Also, my boss, Beverly McKeone (ext. 1260) must approve the draft before I can go to legal notice. So if she is booked, she may not be able to immediately review the draft permit. i.e., I have little control over her time.

I will be in contact with you if I should have questions about the application. If you need to contact me, please email me.

I hope the above is of help to you.

I will be in touch.

John Legg  
Permit Writer  
WVDEP DAQ  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25305  
[John.c.legg@wv.gov](mailto:John.c.legg@wv.gov)  
(304) 926-0499 ext. 1257



9/10/15

9/10/15

west virginia department of environmental protection

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

September 10, 2015

Mark H. Gaston  
840 DuPont Road  
State Route 892  
Washington, WV 26181

RE: Application Status: Complete  
Kuraray America, Inc.  
Kuraray Washington Works, Wood County, WV  
Permit Application R13-1230A  
Plant ID No. 107-00181

Dear Mr. Gaston:

Your application for a modification permit for a second de-watering, drying and truck loading operation (for PVB/water slurry) was received by this Division on June 17, 2015 and assigned to the writer for review on June 23, 2015. On July 2, 2015, the writer sent Kuraray an incomplete letter listing the following deficiencies:

- non-confidential information in the application was claimed as confidential and
- the Control Device Sheet (Baghouse) for B33C was deemed to be incomplete, i.e., numerous items (manufacturer, model no., total number of compartments, bag dimensions, cloth area, number of bags, etc.) were identified as being TBD (to be determined).

On July 17, 2015, the DAQ received Kuraray's revised application pages/submittal correcting previously identified "confidential" items to "non-confidential." On September 2, 2015, the DAQ received Kuraray's revised Control Device Sheet (Baghouse) for B33C. The missing information was supplied and no longer marked "TBD."

Upon review of the above, revised information, it has been determined that the application is now complete and, therefore, the statutory review period commenced on September 2, 2015.

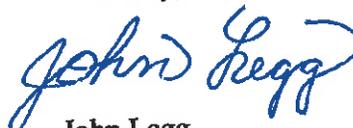
**In the case of this application, the agency believes it will take approximately 90 days (from the September 2, 2015 complete date) to make a final permit determination.**

9/10/15

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact me at (304) 926-0499 ext. 1257.

Sincerely,

A handwritten signature in blue ink that reads "John Legg". The signature is written in a cursive style with a large, sweeping initial "J".

John Legg  
Permit Writer

**From:** Gaston, Mark [<mailto:Mark.Gaston@kuraray.com>]

**Sent:** Thursday, September 10, 2015 3:51 PM

**To:** Legg, John C

**Subject:** RE: R13-1230A - Application Complete Letter: Kuraray Washington Works (107-00181)

9/10/15

Thank you, John, for your prompt response.

Regards,

Mark H. Gaston  
Sr. Process Engineer – Sr. Environmental Consultant  
Kuraray America, Inc.  
Parkersburg, WV Plant  
Email: [Mark.Gaston@kuraray.com](mailto:Mark.Gaston@kuraray.com)  
304-210-9192

**From:** Legg, John C [<mailto:John.C.Legg@wv.gov>]

**Sent:** Thursday, September 10, 2015 3:49 PM

**To:** Gaston, Mark

**Subject:** R13-1230A - Application Complete Letter: Kuraray Washington Works (107-00181)

9/10/15

Mark,

I reviewed your recent Bag House B33C submission (dated 9/2/15) and was able to deem your application complete.

The complete letter is attached and has been mailed to you.

Please email me if you have any concerns or questions.

Thanks,

John Legg  
Permit Writer  
DAQ  
901 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: (304) 926-0499 ext. 1257  
[John.c.legg@WV.gov](mailto:John.c.legg@WV.gov)

**From:** Gaston, Mark [<mailto:Mark.Gaston@kuraray.com>]

**Sent:** Wednesday, September 02, 2015 8:57 AM

**To:** Legg, John C

**Subject:** Kuraray Permit Application-R13-1230A - Att M (APCD) for Bag-House B33C Now Complete

Legg, John C

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**From:** Legg, John C  
**Sent:** Wednesday, September 02, 2015 1:57 PM  
**To:** 'Gaston, Mark'  
**Subject:** RE: Kuraray Permit Application R13-1230A - Att M (APCD) for Bag House B33C Now Complete

9/2/15

Mark,

It maybe a couple of weeks before I can start on your stuff.

I will look the newly sent information over in the next 3 to 4 day and send you a complete letter (or an incomplete letter if this is the case) early next week.

Other items that have since been assigned to me, will need to be completed before I can begin on your stuff.

I will be back to you next week once I review my work load.

Thanks,

John Legg  
WV DEP DAQ  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
(304) 926-0499 ext. 1257  
[John.c.legg@wv.gov](mailto:John.c.legg@wv.gov)

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**From:** Gaston, Mark [<mailto:Mark.Gaston@kuraray.com>]  
**Sent:** Wednesday, September 02, 2015 8:57 AM  
**To:** Legg, John C  
**Subject:** Kuraray Permit Application R13-1230A - Att M (APCD) for Bag House B33C Now Complete

9/2/15

John,

I finally received from the equipment vendor the detail design and specifications for the new bag house (unit B33C) for the second drying line at Kuraray Washington Works. This information is required in Attachment M, the APCD for this unit, part of the permit application for a modification to permit R13-1230. In my original submittal on June 14, 2015, in this attachment I had marked the fields for which I did not yet have data as "TBD". You had responded that all data is required to process the application. Yesterday I sent to you by certified mail the revised CBI and public versions of Attachment M for the new bag house with all the data now included.

With this email I am sending you electronic pdf files of the CBI and public versions of the revised attachment. The pdf's actually include all attachments M through Q. This is to be consistent with the organization of the electronic version of the application in the CD's that were part of the original submittal. Please note that only pages in Attachment M for unit B33C have been revised; there are no changes to any of the other attachments included in the pdf's. Hopefully you can process these pdf's as "drop-in" replacements for the original versions.

If you have any questions, please call or email me at the contacts below.

Regards,



**Attachment J**  
**EMISSION POINTS DATA SUMMARY SHEET**

**Table 2: Release Parameter Data**

Emission Point ID (Must match Emission Units Table)	Inner Diameter (ft)	Exit Gas			Emission Point Elevation (ft)		UTM Coordinates (km) Zone #17	
		Temp (°F)	Volumetric Flow <sup>1</sup> (ACFM) At operating conditions	Velocity (ft/s)	Ground Level (Height above mean seal level)	Stack Height <sup>2</sup> (Release height of emissions above ground level)	Northing	Easting
B30E	Redacted	125	Redacted	93	628	80	4346.94	442.43
B32AE	Redacted	100	Redacted	88	628	63	4346.93	442.41
B33E	Redacted	125	Redacted	93	628	56	4346.85	442.40
B34E	Redacted	100	Redacted	85	628	82	4346.83	442.40

<sup>1</sup> Give at operating conditions. Include inerts.

<sup>2</sup> Release height of emissions above ground level.

Attachment L  
EMISSIONS UNIT DATA SHEET  
GENERAL

23 pages of Application Pages  
Revised 7/15/15  
9/1/15

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*): B30

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

Cyclone  
Fisher-Klosterman, Inc.

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:

Redacted

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

Redacted

Redacted

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

None

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

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:

@	Redacted	°F and	Redacted	psia	
a. NO <sub>x</sub>		N/A	lb/hr	N/A	grains/ACF
b. SO <sub>2</sub>		N/A	lb/hr	N/A	grains/ACF
c. CO		N/A	lb/hr	N/A	grains/ACF
d. PM <sub>10</sub>		0	lb/hr	0	grains/ACF
e. Hydrocarbons		N/A	lb/hr	N/A	grains/ACF
f. VOCs		N/A	lb/hr	N/A	grains/ACF
g. Pb		N/A	lb/hr	N/A	grains/ACF
h. Specify other(s)					
PM		2.4	lb/hr	Redacted	grains/ACF
			lb/hr		grains/ACF
			lb/hr		grains/ACF
			lb/hr		grains/ACF

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.

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:					
@	Redacted	°F and	Redacted	psia	
a.	NO <sub>x</sub>	N/A	lb/hr	N/A	grains/ACF
b.	SO <sub>2</sub>	N/A	lb/hr	N/A	grains/ACF
c.	CO	N/A	lb/hr	N/A	grains/ACF
d.	PM <sub>10</sub>	0	lb/hr	0	grains/ACF
e.	Hydrocarbons	N/A	lb/hr	N/A	grains/ACF
f.	VOCs	N/A	lb/hr	N/A	grains/ACF
g.	Pb	N/A	lb/hr	N/A	grains/ACF
h.	Specify other(s)				
	PM	0.4	lb/hr	Redacted	grains/ACF
			lb/hr		grains/ACF
			lb/hr		grains/ACF
			lb/hr		grains/ACF

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.

**9. 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**

See Appendix O

**RECORDKEEPING**

See Appendix O

**REPORTING**

See Appendix O

**TESTING**

See Appendix O

**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 OPERATION/AIR POLLUTION CONTROL DEVICE.

**RECORDKEEPING.** PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

**REPORTING.** PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

**TESTING.** PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

**10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty**

Change filter bags during routine outages, currently scheduled every 12 to 18 months.

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*): B33

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

Cyclone

Manufacturer to be determined

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:

Redacted

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

Redacted

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

None

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

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:

@	Redacted	°F and	Redacted	psia	
a. NO <sub>x</sub>		N/A	lb/hr	N/A	grains/ACF
b. SO <sub>2</sub>		N/A	lb/hr	N/A	grains/ACF
c. CO		N/A	lb/hr	N/A	grains/ACF
d. PM <sub>10</sub>		0	lb/hr	0	grains/ACF
e. Hydrocarbons		N/A	lb/hr	N/A	grains/ACF
f. VOCs		N/A	lb/hr	N/A	grains/ACF
g. Pb		N/A	lb/hr	N/A	grains/ACF
h. Specify other(s)					
PM		3.4	lb/hr	Redacted	grains/ACF
			lb/hr		grains/ACF
			lb/hr		grains/ACF
			lb/hr		grains/ACF

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.

9. 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**

See Appendix O

**RECORDKEEPING**

See Appendix O

**REPORTING**

See Appendix O

**TESTING**

See Appendix O

**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 OPERATION/AIR POLLUTION CONTROL DEVICE.

**RECORDKEEPING.** PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

**REPORTING.** PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

**TESTING.** PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

Inspections during planned outages to ensure mechanical integrity

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:

@	Redacted	°F and	Redacted	psia
a. NO <sub>x</sub>		N/A lb/hr	N/A	grains/ACF
b. SO <sub>2</sub>		N/A lb/hr	N/A	grains/ACF
c. CO		N/A lb/hr	N/A	grains/ACF
d. PM <sub>10</sub>		0 lb/hr	0.0	grains/ACF
e. Hydrocarbons		N/A lb/hr	N/A	grains/ACF
f. VOCs		N/A lb/hr	N/A	grains/ACF
g. Pb		N/A lb/hr	N/A	grains/ACF
h. Specify other(s)				
PM		0.56 lb/hr	Redacted	grains/ACF
				grains/ACF
				grains/ACF
				grains/ACF

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.

9. 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**

See Appendix O

**RECORDKEEPING**

See Appendix O

**REPORTING**

See Appendix O

**TESTING**

See Appendix O

**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 OPERATION/AIR POLLUTION CONTROL DEVICE.

**RECORDKEEPING.** PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

**REPORTING.** PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

**TESTING.** PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

Change filter bags during routine outages, currently scheduled every 12 to 18 months.

*no change*



22. Type of Pollutant(s) to be collected (if particulate give specific type):

PM

23. Is there any SO<sub>3</sub> in the emission stream?  No  Yes SO<sub>3</sub> content: ppmv

24. Emission rate of pollutant (specify) into and out of collector at maximum design operating conditions:

Pollutant	IN		OUT	
	lb/hr	grains/acf	lb/hr	grains/acf
PM	2.4	Redacted	0.0024	Redacted

25. Complete the table:

Particulate Size Range (microns)	Particle Size Distribution at Inlet to Collector	Fraction Efficiency of Collector
	Weight % for Size Range	Weight % for Size Range
0 - 2	PS Dist'n redacted	min 99.9
2 - 4		for all extant ranges
4 - 6		
6 - 8		
8 - 10		
10 - 12		
12 - 16		
16 - 20		
20 - 30		
30 - 40		
40 - 50		
50 - 60		
60 - 70		
70 - 80		
80 - 90		
90 - 100		
>100		

**32. 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:

See Appendix O

RECORDKEEPING:

See Appendix O

REPORTING:

See Appendix O

TESTING:

See Appendix O

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.

33. Manufacturer's Guaranteed Capture Efficiency for each air pollutant.  
Assumed at 100% for a hard-piped connection to the control device.

*no change*

34. Manufacturer's Guaranteed Control Efficiency for each air pollutant.

The manufacturer has provided a performance expectation to meet or exceed 99.9% removal efficiency with a particle size of 2.0 microns or larger. This expectation is not be construed as a guarantee.

35. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.

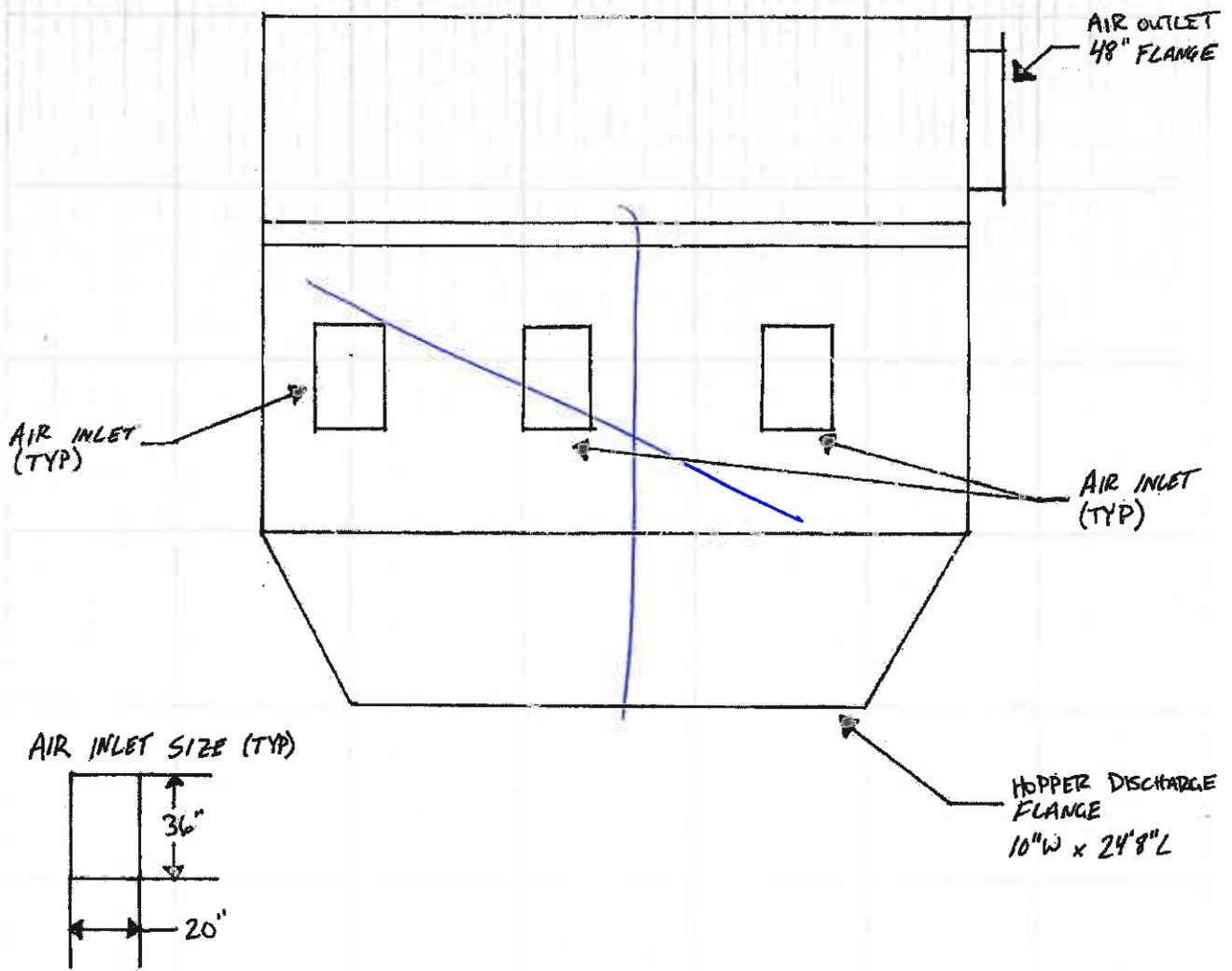
N/A



Architects • Engineers • Surveyors

CLIENT KURARAY SHEET NO. \_\_\_\_\_  
 PROJECT \_\_\_\_\_ PROJECT NO. \_\_\_\_\_  
 SUBJECT ATTACHMENT M - BAGHOUSE SKETCH B30C DATE \_\_\_\_\_  
 BY/CHKD. JPF

4 AIR (WITH SMALL AMOUNT OF FINES) ENTERS THE BAGHOUSE THROUGH ONE OF THREE INLET DUCTS. THE AIR THEN PASSES THROUGH THE FILTER MEDIA BEFORE BEING DISCHARGED TO THE ATMOSPHERE BY THE BLOWER (NOT SHOWN). THE SOLIDS COLLECTED ARE DISPOSED OF AS NON-HAZARDOUS SOLID WASTE.



2099 E. State St. Suite B  
 Athens, OH 45701  
 740.593.3327

11283 Emerson Ave.  
 Parkersburg, WV 26104  
 304.464.5305

326 3rd Street, Suite 3  
 Marietta, OH 45750  
 740.374.2396

• 15M

www.pickeringusa.com

**Attachment M**  
**Air Pollution Control Device Sheet**  
 (BAGHOUSE)

Control Device ID No. (must match Emission Units Table): B33C

**Equipment Information and Filter Characteristics**

1. Manufacturer: <b>TBD</b> Model No. <b>TBD</b>	2. Total number of compartments: <b>TBD</b> 3. Number of compartment online for normal operation: <b>TBD</b>
4. 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.	
5. Baghouse Configuration: (check one) <input type="checkbox"/> Open Pressure <input type="checkbox"/> Closed Pressure <input checked="" type="checkbox"/> Closed Suction <input type="checkbox"/> Electrostatically Enhanced Fabric <input type="checkbox"/> Other, Specify	
6. Filter Fabric Bag Material: <input type="checkbox"/> Nomex nylon <input type="checkbox"/> Wool <input checked="" type="checkbox"/> Polyester <input type="checkbox"/> Polypropylene <input type="checkbox"/> Acrylics <input type="checkbox"/> Ceramics <input type="checkbox"/> Fiber Glass <input type="checkbox"/> Cotton Weight <input type="checkbox"/> Teflon Thickness <input type="checkbox"/> Others, specify	7. Bag Dimension: Diameter <b>TBD</b> in. Length <b>TBD</b> ft. 8. Total cloth area: <b>TBD</b> ft <sup>2</sup> 9. Number of bags: <b>TBD</b> 10. Operating air to cloth ratio: <b>TBD</b> ft/min
11. Baghouse Operation: <input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Automatic <input type="checkbox"/> Intermittent	
12. Method used to clean bags: <input type="checkbox"/> Mechanical Shaker <input type="checkbox"/> Sonic Cleaning <input type="checkbox"/> Reverse Air Jet <input type="checkbox"/> Pneumatic Shaker <input type="checkbox"/> Reverse Air Flow <input type="checkbox"/> Other: <input type="checkbox"/> Bag Collapse <input checked="" type="checkbox"/> Pulse Jet <input type="checkbox"/> Manual Cleaning <input type="checkbox"/> Reverse Jet	
13. Cleaning initiated by: <input type="checkbox"/> Timer <input type="checkbox"/> Frequency if timer actuated <input type="checkbox"/> Expected pressure drop range <b>TBD</b> in. of water <input checked="" type="checkbox"/> Other To be specified at detail project design	
14. Operation Hours: Max. per day: <b>24.</b> Max. per yr: <b>8760.</b>	15. Collection efficiency: Rating: <b>99.9% at 2µm %</b> Guaranteed minimum: <b>%</b>

**Gas Stream Characteristics**

16. Gas flow rate into the collector: <b>67,500</b> ACFM at Redacted °F and Redacted PSIA ACFM: Design: <b>TBD</b> PSIA Maximum: Redact. PSIA Average Expected: Redact. PSIA	
17. Water Vapor Content of Effluent Stream: <b>0.027</b> lb. Water/lb. Dry Air	
18. Gas Stream Temperature: <b>Redacted</b> °F	19. Fan Requirements: <b>200</b> hp OR <b>ft<sup>3</sup>/min</b>
20. Stabilized static pressure loss across baghouse. Pressure Drop: High <b>2</b> in. H <sub>2</sub> O Low <b>0</b> in. H <sub>2</sub> O	
21. Particulate Loading: Inlet: <b>0.0058</b> grain/scf Outlet: <b>5.8x10<sup>-6</sup></b> grain/scf	

*Revised again on 9/21/15*

*page revised 7/15/2015*

71R

14

22. Type of Pollutant(s) to be collected (if particulate give specific type):  
 PM

23. Is there any SO<sub>3</sub> in the emission stream?  No  Yes SO<sub>3</sub> content: ppmv

24. Emission rate of pollutant (specify) into and out of collector at maximum design operating conditions:

Pollutant	IN		OUT	
	lb/hr	grains/acf	lb/hr	grains/acf
PM	3.4	0.0058	0.0034	5.8x10 <sup>-6</sup>

25. Complete the table:

Particulate Size Range (microns)	Particle Size Distribution at Inlet to Collector	Fraction Efficiency of Collector
	Weight % for Size Range	Weight % for Size Range
0 - 2	PS Dist'n redacted	Min 99.9
2 - 4		For all extant ranges
4 - 6		
6 - 8		
8 - 10		
10 - 12		
12 - 16		
16 - 20		
20 - 30		
30 - 40		
40 - 50		
50 - 60		
60 - 70		
70 - 80		
80 - 90		
90 - 100		
>100		

*Reviewed again on 9/15/15*

**32. 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:

See Attachment O

RECORDKEEPING:

See Attachment O

REPORTING:

See Attachment O

TESTING:

See Attachment O

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.

**33. Manufacturer's Guaranteed Capture Efficiency for each air pollutant.**

Assume at 100% for a hard-piped connection to the control device.

**34. Manufacturer's Guaranteed Control Efficiency for each air pollutant.**

The manufacturer has provided a performance expectation to meet or exceed 99.9% removal efficiency with a particle size of 2.0 microns or larger. This expectation is not be construed as a guarantee.

**35. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.**

N/A

*Revised again on 9/2/15*

**Attachment M  
Air Pollution Control Device Sheet  
(BAGHOUSE)**

Control Device ID No. (must match Emission Units Table): B33C

**Equipment Information and Filter Characteristics**

1. Manufacturer: <b>TBD</b>		2. Total number of compartments: <b>TBD</b>	
Model No. <b>TBD</b>		3. Number of compartment online for normal operation: <b>TBD</b>	
4. 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.			
5. Baghouse Configuration: <input type="checkbox"/> Open Pressure <input type="checkbox"/> Closed Pressure <input checked="" type="checkbox"/> Closed Suction (check one) <input type="checkbox"/> Electrostatically Enhanced Fabric <input type="checkbox"/> Other, Specify			
6. Filter Fabric Bag Material: <input type="checkbox"/> Nomex nylon <input type="checkbox"/> Wool <input checked="" type="checkbox"/> Polyester <input type="checkbox"/> Polypropylene <input type="checkbox"/> Acrylics <input type="checkbox"/> Ceramics <input type="checkbox"/> Fiber Glass <input type="checkbox"/> Cotton Weight      oz./sq.yd <input type="checkbox"/> Teflon Thickness      in <input type="checkbox"/> Others, specify		7. Bag Dimension: Diameter <b>TBD</b> in. Length <b>TBD</b> ft.	
		8. Total cloth area: <b>TBD</b> ft <sup>2</sup>	
		9. Number of bags: <b>TBD</b>	
		10. Operating air to cloth ratio: <b>TBD</b> ft/min	
11. Baghouse Operation: <input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Automatic <input type="checkbox"/> Intermittent			
12. Method used to clean bags: <input type="checkbox"/> Mechanical Shaker <input type="checkbox"/> Sonic Cleaning <input type="checkbox"/> Reverse Air Jet <input type="checkbox"/> Pneumatic Shaker <input type="checkbox"/> Reverse Air Flow <input type="checkbox"/> Other: <input type="checkbox"/> Bag Collapse <input checked="" type="checkbox"/> Pulse Jet <input type="checkbox"/> Manual Cleaning <input type="checkbox"/> Reverse Jet			
13. Cleaning initiated by: <input type="checkbox"/> Timer <input type="checkbox"/> Frequency if timer actuated <input type="checkbox"/> Expected pressure drop range <b>TBD</b> in. of water <input checked="" type="checkbox"/> Other To be specified at detail project design			
14. Operation Hours: Max. per day: <b>24.</b> Max. per yr: <b>8760.</b>		15. Collection efficiency: Rating: <b>99.9%</b> at 2µm % Guaranteed minimum: %	

**Gas Stream Characteristics**

16. Gas flow rate into the collector: Redacted ACFM at Redacted °F and Redacted PSIA ACFM: Design: <b>TBD</b> PSIA Maximum: Redact. PSIA Average Expected: Redact. PSIA			
17. Water Vapor Content of Effluent Stream: <b>0.027</b>		lb. Water/lb. Dry Air	
18. Gas Stream Temperature: Redacted °F		19. Fan Requirements: Redacted hp OR ft <sup>3</sup> /min	
20. Stabilized static pressure loss across baghouse. Pressure Drop: High <b>2</b> in. H <sub>2</sub> O Low <b>0</b> in. H <sub>2</sub> O			
21. Particulate Loading: Inlet: Redacted grain/scf Outlet: Redacted grain/scf			

• 16 M  
baghouse 2

22. Type of Pollutant(s) to be collected (if particulate give specific type):

PM

23. Is there any SO<sub>3</sub> in the emission stream?  No  Yes SO<sub>3</sub> content: ppmv

24. Emission rate of pollutant (specify) into and out of collector at maximum design operating conditions:

Pollutant	IN		OUT	
	lb/hr	grains/acf	lb/hr	grains/acf
PM	3.4	Redacted	0.0034	Redacted

25. 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	PS Dist'n redacted	Min 99.9
2 – 4		For all extant ranges
4 – 6		
6 – 8		
8 – 10		
10 – 12		
12 – 16		
16 – 20		
20 – 30		
30 – 40		
40 – 50		
50 – 60		
60 – 70		
70 – 80		
80 – 90		
90 – 100		
>100		

26. How is filter monitored for indications of deterioration (e.g., broken bags)?

- Continuous Opacity
- Pressure Drop
- Alarms-Audible to Process Operator
- Visual opacity readings, Frequency: Calendar month, 45 days/max
- Other, specify:

27. Describe any recording device and frequency of log entries:  
Process historian on a continuous basis

28. Describe any filter seeding being performed:

N/A

29. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification):

N/A

30. Describe the collection material disposal system:

Collected in bins and disposed of as non-hazardous solid waste.

31. Have you included **Baghouse Control Device** in the Emissions Points Data Summary Sheet? Yes

**32. 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:**

See Appendix O

**RECORDKEEPING:**

See Appendix O

**REPORTING:**

See Appendix O

**TESTING:**

See Appendix O

**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.

**33. Manufacturer's Guaranteed Capture Efficiency for each air pollutant.**

Assume at 100% for a hard-piped connection to the control device.

**34. Manufacturer's Guaranteed Control Efficiency for each air pollutant.**

The manufacturer has provided a performance expectation to meet or exceed 99.9% removal efficiency with a particle size of 2.0 microns or larger. This expectation is not be construed as a guarantee.

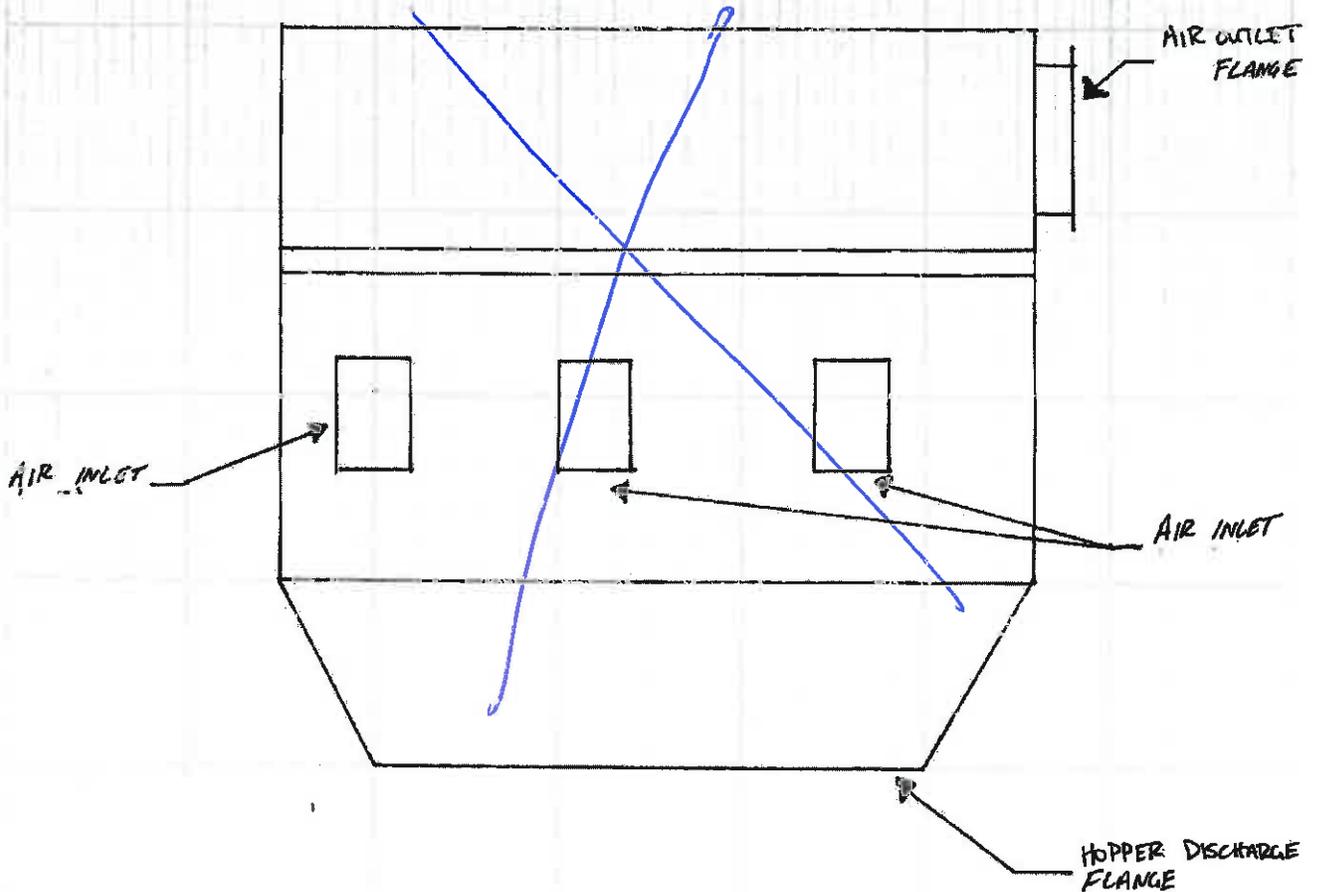
**35. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty.**  
N/A



Architects • Engineers • Surveyors

CLIENT KURARAY SHEET NO. \_\_\_\_\_  
 PROJECT \_\_\_\_\_ PROJECT NO. \_\_\_\_\_  
 SUBJECT ATTACHMENT M - BAGHOUSE SKETCH B 33 C DATE \_\_\_\_\_  
 BY/CHKD JPF

4 AIR (WITH SMALL AMOUNT OF FINES) ENTERS THE BAGHOUSE THROUGH ONE OF THREE INLET DUCTS. THE AIR THEN PASSES THROUGH THE FILTER MEDIA BEFORE BEING DISCHARGED TO THE ATMOSPHERE BY THE BLOWER (NOT SHOWN). THE SOLIDS COLLECTED ARE DISPOSED OF AS NON-HAZARDOUS SOLID WASTE.



2099 E. State St. Suite B  
 Athens, OH 45701  
 740.593.3327

11283 Emerson Ave.  
 Parkersburg, WV 26104  
 304.464.5305

326 3rd Street, Suite 3  
 Marietta, OH 45750  
 740.374.2396

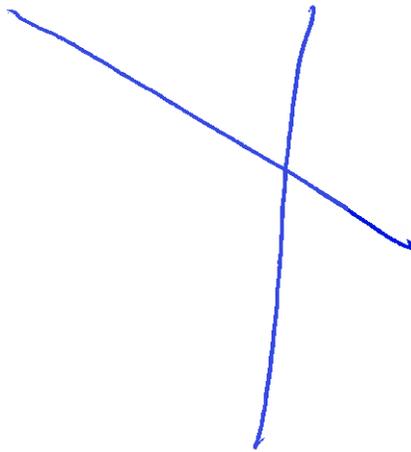
www.pickeringusa.com

• 18M

21

**ATTACHMENT N  
SUPPORTING CALCULATIONS**

Supporting calculations are confidential business information and are redacted.



# Key Information Problem

To fix Application's Confidential

Pg	Form	Type Equip.	Redacted Information	Comments
1J	Emission Units Table		Design Capacity CFM	fixed 7/15/15
2J	Emission Points Data Summary Sheet		Emission Concentration (mg/M3)	fixed 7/15/15
3J	Emission Points Data Summary Sheet		Inner Diameter (ft)	fixed 7/15/15
4L	Emissions Unit Data Sheet	Chemical Process	Max Htly & Annual Production	Ends on page 7 of 13 - Where other Pages?
5L	Emissions Unit Data Sheet	Cyclone #1	Name & Amount of Material Charge & Produced	Material not named even on Conf. Version
6L	Emissions Unit Data Sheet	Cyclone #1	PM grains/ACF	fixed 7/15/15
7L	Emissions Unit Data Sheet	Cyclone #2	Name & Amount of Material Charge & Produced	Sheets Out of Order - They follow 10L
8L	Emissions Unit Data Sheet	Cyclone #2	PM grains/ACF	Sheets Out of Order - They follow 10L
9L	Emissions Unit Data Sheet	Rework Filter #1	Amount of Material Charged & Produced	Material named - different that 5L
10L	Emissions Unit Data Sheet	Rework Filter #1	PM grains/ACF	fixed 7/15/15
11L	Emissions Unit Data Sheet	Rework Filter #2	Amount of Material Charged & Produced	Material named - different that 5L
12L	Emissions Unit Data Sheet	Rework Filter #2	PM grains/ACF	fixed 7/15/15
13M	Air Pollution Control Device Sheet	Baghouse #1	Model No., # of compart.; bag dimen.; tot cloth area; air/cloth ratio; met. of clearing bag; gas flow; gas temp; gas psia; gas temp; fan hp; particulate loading	fixed (mostly) 7/15/15
14M	Air Pollution Control Device Sheet	Baghouse #1	Particle Size Distribution	grains/acf fixed 7/15/15
7M	Air Pollution Control Device Sheet	Baghouse #1	pg 3 of 4 - Describe collection disposal system	Not in Index - Marked Redacted in non-conf but not in conf.
15M	Air Pollution Control Device Sheet	Baghouse #1	Sketch - discharge blower hp	fixed 7/15/15
16M	Air Pollution Control Device Sheet	Baghouse #2	Equipment Not Selected; gas flow, gas temp; gas psia; gas temp; fan hp; particulate loading	Same as 13M but Equipment Not Selected - TBD
17M	Air Pollution Control Device Sheet	Baghouse #2	Particle Size Distribution	fixed 7/15/15
18M	Air Pollution Control Device Sheet	Baghouse #2	Sketch - Blower HP	fixed 7/15/15
19N	Calculations		3 pages	Supporting Calculation are Confidential Business Information and are redacted fixed 7/17/15

12

7. ?

generated by John Legg

9/2/15

**kuraray**

Kuraray America, Inc.  
Washington Works Plant  
8480 DuPont Road  
Washington, WV 26181

Id. No. 107-00181 Reg. R13-1230A  
Company Kuraray America, Inc.  
Facility Washington Region 2  
Initials JC Legg



CERTIFIED MAIL –  
RETURN RECEIPT REQUESTED

September 1, 2015

Mr. John Legg, Permit Writer  
Division of Air Quality  
WV Department of Environmental Protection  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304

Dear Mr. Legg:

On June 14<sup>th</sup>, 2015 I submitted to the WV-DAQ an application to modify permit R13-1230 for the PVB resin drying area at Kuraray America, Inc. Washington Works facility, to construct a second PVB resin drying line, with a subsequent update submitted on July 15, 2015.

Item #15 of your response letter to me following the original submission (letter, J. Legg to M. H. Gaston, July 2, 2015), stated:

“Attachment M, air Pollution Control Device (Baghouse) for B33C: Cannot be left as TBD. Also once baghouse equipment has been determined, cannot be claimed confidential as in No. 10 above”.

The project equipment vendor has now completed the design and specifications for the new bag house (B33C). I am enclosing the revised CBI and public versions of Attachment M, “Air Pollution Control Device Sheet” for B33C, with all of the information now included. Please email or call me if you have any further questions.

Sincerely

Mark H. Gaston

Sr. Environmental Consultant  
Kuraray America, Inc.  
Washington Works Plant  
Email: Mark.Gaston@kuraray.com  
304-210-9192

Enclosures



7/17/15



Kuraray America, Inc.  
Washington Works Plant  
8480 DuPont Road  
Washington, WV 26181

CERTIFIED MAIL –  
RETURN RECEIPT REQUESTED

July 15, 2015

Mr. James P Fedczak, II, Engineer Chief  
Division of Air Quality  
WV Department of Environmental Protection  
601 57th Street, SE  
Charleston, WV 25304

Dear Mr. Fedczak:

COVER DOCUMENT FOR CONFIDENTIAL INFORMATION  
PVB Resin Drying Area - Permit R13-1230A  
Permit Modification – Construct Second Resin Drying Line

In accordance with 45CSR31 sections 3.2 and 3.3, this letter serves as the cover document for confidential information being submitted this date by Kuraray America Inc. to the Division of Air Quality [DAQ] pertaining to the subject file/matter.

Based on guidance provided by WV-DAQ Permit Engineer John Legg (letter, J. Legg to M. H. Gaston, July 2, 2015), the set of information being claimed as confidential business information in my earlier CBI letter to you (letter, M. H. Gaston to J. P. Fedczak, June 14, 2015), is being reduced to be consistent with 43CSR31, interpretive rules 45CSR31A, and 45CSR31B, and Appendix A to Subpart A of 40 CFR Part 51. This letter and its attachment supersedes the earlier letter.

The “Claimed Confidential” information for the calculations, production information, and process descriptions should permanently be maintained in a confidential file until declassified by Kuraray. Section 10, Article 5, Chapter 22 of the West Virginia Code, as amended, allows the designation of documents as confidential.

The confidential section (Attachment) provides a description of the process technology changes and process rate information used in the calculation of emissions. This modification is associated with the process area currently covered by Permit R13-1230.

Reasons for confidentiality of the submitted pages, required by Section 4.1(e)(1) are detailed in the attachment using the following numbers:

1. Process technology-Disclosure of this information would compromise competitive advantage since it describes the interaction of the various unit operations involved in the manufacture of a proprietary, marketable product.

2. Process Rates-Disclosure of this information would be harmful to the business in three areas-competitive advantage, cost advantage, and technological advantage-all three are important to the continued financial health and future survival of the business.
3. Ingredients-Disclosure of this information would cause harm because these allow the product to exhibit specific properties that differentiate it, and make it superior, from a competitive standpoint.

To satisfy the requirements specified in Section 4.1.a, we are stating that the claim of confidentiality has not expired by its terms, nor been waived or withdrawn.

To satisfy the requirements specified in Section 4.1.b, we are stating that the information claimed as confidential is not available to the general public and it is not reasonably obtainable within Kuraray without the consent of a business manager. All employees are aware of the competitive nature of their businesses and are trained in the guarding of confidential information. When printed, the information has a cover indicating it is confidential and the pages within are so stamped. When such documents are handled internally, they must be kept under the person's control and not left unattended in full view. Access to confidential documents is limited to those personnel with a "need-to-know".

To maintain the confidentiality of such information as required by Section 4.1.c, Kuraray employees involved with confidential information such as flow sheets, calculations, stream concentrations, ingredients, and equipment design or capacity sign a confidentiality agreement as stipulated by Kuraray legal advisors. Transmission of such information is sent by courier, certified mail, or secure (encrypted) electronic systems, with common electronic transmission restricted to avoid interception of the information by competitor or foreign governments.

There is no statute that has been reviewed that requires the disclosure of information claimed as confidential.

The confidential information designee who can be contacted about the information is the undersigned.

If you have questions or need additional information concerning the claim of confidentiality, please contact me at (304) 210-9192.

Sincerely,



Mark H. Gaston

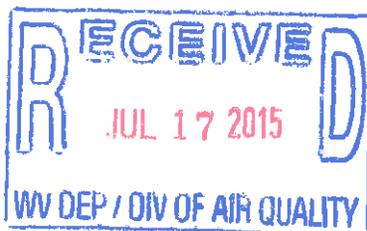
Sr. Environmental Consultant  
Kuraray America, Inc.  
Washington Works Plant  
Email: Mark.Gaston@kuraray.com  
304-210-9192

Enclosures

**Attachment**  
**Index of Sheets Claimed Confidential**

<b><u>Appendix /Page number</u></b>	<b><u>Reason Code</u></b>
<u>L (EU DS Chemical Process) Pg 1</u>	<u>2</u>
<u>L (EU DS Cyclone #1) Pg 1</u>	<u>1, 2</u>
<u>L (EU DS Cyclone #2) Pg 1</u>	<u>1, 2</u>
<u>L (ECDS Rework Filter #1) Pg 1</u>	<u>1, 2</u>
<u>L (ECDS Rework Filter #2) Pg 1</u>	<u>1, 2</u>
<u>M (APCD Baghouse #1) Pg 1</u>	<u>1</u>
<u>M (APCD Baghouse #1) Pg 2</u>	<u>1, 3</u>
<u>M (APCD Baghouse #1) Pg 3</u>	<u>1, 2</u>
<u>M (APCD Baghouse #2) Pg 1</u>	<u>1</u>
<u>M (APCD Baghouse #2) Pg 2</u>	<u>1, 3</u>
<u>N Supporting Calculations</u>	<u>1, 2</u>

7/17/15



**kuraray**

Kuraray America, Inc.  
Washington Works Plant  
8480 DuPont Road  
Washington, WV 26181

CERTIFIED MAIL –  
RETURN RECEIPT REQUESTED

July 15, 2015

Mr. John Legg, Permit Writer  
Division of Air Quality  
WV Department of Environmental Protection  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304

Dear Mr. Legg:

Attached are the revised pages of the permit application to modify permit R13-1230 for the PVB resin drying area at Kuraray America, Inc. Washington Works facility, to construct a second PVB resin drying line. I have revised the version for public disclosure pursuant to the guidance you provided to me (letter, J. Legg to M. H. Gaston, July 2, 2015).

The original application submitted on June 14, 2015 was organized as two sections, one suitable for public disclosure on white paper, and the other containing Confidential Business Information (CBI) on yellow paper. For convenience, the complete application was provided with the CBI version. Pages with and without confidential information can be distinguished by the presence or absence of the "claimed confidential" note on the page header. This convention is being used with the revised pages provided herewith.

With this letter, only the attachments with revised page(s) are included. Revised pages are so noted by a note with the revision date in the page footer. No revisions to the main section were required.

Your item #15 follows:

"Attachment M, air Pollution Control Device (Baghouse) for B33C: Cannot be left as TBD. Also once baghouse equipment has been determined, cannot be claimed confidential as in No. 10 above".

This need to complete the detailed design items currently marked as "TBD" in the APCD for the B33C baghouse has been communicated to the major equipment vendor for the project. The vendor is working to complete this information as soon as possible, but it will not be available by the fifteen day deadline (July 16, 2015) imposed by your letter of July 2, 2015. This information will be provided to you in a subsequent letter as soon as it is available.

The equipment vendor did revise the design air flow through the L#2 cyclone and baghouse downwards slightly, from 70,000 to 67,500 ACFM. As the particulate mass flow rates did not change, this increased slightly the particulate concentration in the baghouse inlet and outlet. These changes are included in the revised pages being submitted.

A revision to the separate confidential letter is being submitted with this cover letter.

Two CD's are being submitted with this letter. These contain pdf's of the permit sections with the revised pages. To remain consistent with the organization of the information in the CD's submitted with the original application, the information is organized as follows

- Atts H thru K, public version
- Att L, public version
- Att M thru Q, public version
- Att N, public version
- Atts H thru K, CBI version
- Att L, CBI version
- Att M thru Q, CBI version
- Att N, CBI version

Sincerely



Mark H. Gaston

Sr. Environmental Consultant  
Kuraray America, Inc.  
Washington Works Plant  
Email: [Mark.Gaston@kuraray.com](mailto:Mark.Gaston@kuraray.com)  
304-210-9192

Legg, John C

---

**From:** Legg, John C  
**Sent:** Monday, July 06, 2015 10:24 AM  
**To:** 'Gaston, Mark'  
**Cc:** McKeone, Beverly D  
**Subject:** Incomplete Letter: R13-1230A - Kuraray America Inc (107-00181); Washington facility; Wood County, WV

7/6/15

Mark,

In my July 2, 2015 correspondence, I forgot to mention probably the biggest concern about the permit application:

Attachment N states that: "Supporting calculations are confidential business information and are redacted."

It would be highly unlikely in this writer's opinion that the whole calculation section would be confidential. In the calculation section, there could be information that is/are confidential, but the specific item(s) that is/are confidential need(s) to be redacted, and not the entire body of the calculations.

I hope the above makes sense, and I apologize for the above omission/oversite.

Sincerely,

John

---

**From:** Legg, John C  
**Sent:** Thursday, July 02, 2015 3:14 PM  
**To:** 'Gaston, Mark'  
**Cc:** McKeone, Beverly D  
**Subject:** Incomplete Letter: R13-1230A - Kuraray America Inc (107-00181); Washington facility; Wood County, WV

7/2/15

Mark,

Attached is promised correspondence (Incomplete Letter, Rule 31, Rule 31A, and Rule 31B). This information will also be mail to you via U.S. Mail.

Note that Subpart A of 40 C.F.R. Part 51 and Appendix A (of 40 C.F.R. Part 51) need to be reviewed. These documents can be printed from the internet and have not been included with this email.

Sincerely,

John Legg  
Permit Writer  
WVDEP  
Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone (304) 926-0499 ext. 1257  
[John.c.legg@wv.gov](mailto:John.c.legg@wv.gov)

9/2/15

Mark H. Gaston  
Sr. Process Engineer – Sr. Environmental Consultant  
Kuraray America, Inc.  
Parkersburg, WV Plant  
Email: [Mark.Gaston@kuraray.com](mailto:Mark.Gaston@kuraray.com)  
304-210-9192



7/2/15

west virginia department of environmental protection

Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304  
Phone 304/926-0475

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
www.dep.wv.gov

Mark H. Gaston  
8480 DuPont Road  
State Route 892  
Washington, WV 26181

July 2, 2015

Id. No. \_\_\_\_\_ Reg. \_\_\_\_\_  
Company \_\_\_\_\_  
Facility \_\_\_\_\_ Region 2  
Initials \_\_\_\_\_

RE: Application Status: Incomplete  
Kuraray America, Inc.  
Kuraray Washington Works, Wood County, WV  
Permit Application No. R13-1230A  
Plant ID No. 107-00181

Dear Mr. Gaston:

Your application for a modification permit for a second de-watering, drying, and truck loading operation (for PVB/water slurry) was received by this Division on June 17, 2015 and assigned to the writer for review on June 23, 2015. Upon initial review of said application, it has been determined that the application as submitted is incomplete based on the following item(s):

1. Non-confidential information was claimed confidential.

The writer has attached copies of the following: Rule 45CSR31 (Confidential Information); Interpretive Rule 45CSR31A (Release of Previously Submitted Confidential Information); Interpretive Rule 45CSR31B (Confidential Business Information and Emission Data).

Interpretive Rule 31B provides guidance and clarification concerning the term "types and amounts of pollutants discharged" defined under Rule 31, Section 2.4, and thus what information may not be claimed confidential in accordance with Rule 31, Section 6.1.: "No person shall claim as confidential, information concerning the types and amounts of air pollutants discharged."

Interpretive Rule 31B, Section 4.2 entitled "What Information Constitutes Emission Data" states: "The data elements and types of information listed in Tables 2A through 2D of Appendix A to Subpart A of 40 C.F. R. Part 51, as further defined in the Glossary in such Appendix, will be considered emission data if the information is found to be necessary to determine emission or location in accordance with subsection 4.1."

Note that **Subpart A of 40 C.F.R. Part 51 and Appendix A (of 40 C.F.R. Part 51)** need to be reviewed. **These documents can be printed from the internet and have not been attached to this letter.**

The writer read through permit application R13-1230A and offers the following comments:

1. Attachment I, Emission Units Table, page 1 of 1. Design capacity should not be marked confidential.
2. Attachment J, Emission Points Data Summary Sheet, page 1 of 3. Emission Concentration (mg/M3) should not be marked confidential.
3. Attachment J, Emission Point Data Summary Sheet, page 3 of 3. The inner Diameter (ft) and volumetric flow (ACFM) of the emission points should not be marked confidential.
4. Attachment L, Emission Unit Data Sheet General for B30, page 1 of 4. Redacted name of process material. This maybe okay, but is different than: EUDS for Chemical Process page 1 of 13, No. 4. - Product Name specified; EUDS for B32A page 1 of 4, No. 3. - process material specified; and EUDS for B34 page 1 of 4, No. 3. - process material specified.
5. Attachment L, Emission Unit Data Sheet General for B30, page 3 of 4. PM grains/ACF should not be marked confidential.
6. Attachment L, Emission Unit Data Sheet General for B32A, page 3 of 4. PM grains/ACF should not be marked confidential.
7. Attachment L, Emission Unit Data Sheet General for B33, page 1 of 4. Redacted name of process material. This maybe okay, but is different than: EUDS for Chemical Process page 1 of 13, No. 4 - Product Name specified; EUDS for B32A page 1 of 4, No. 3 - process material specified; and EUDS for B34 page 1 of 4, No. 3 - process material specified.
8. Attachment L, Emission Unit Data Sheet General for B33, page 3 of 4. PM grains/ACF should not be marked confidential.
9. Attachment L, Emission Unit Data Sheet General for B34, page 3 of 4. PM grains/ACF should not be marked confidential.
10. Attachment M, Air Pollution Control Device Sheet (Baghouse) for B30C, page 1 of 4. Model No.; No. of compartments; bag dimensions; cloth area; no. of bags; gas flow into collector; and ACFM should not be marked confidential. Other redacted entries may or may not be confidential.
11. Attachment M, Air Pollution Control Device Sheet (Baghouse) for B30C, page 2 of 4. Grains/acf in and out should not be marked confidential.
12. Attachment M, Air Pollution Control Device Sheet (Baghouse) for B30C, page 3 of 4. Item no. 30 is marked Redacted but is not listed in the index of confidential information. This maybe in error?
13. Not sure about blower hp for sketches B30C and B33C being marked confidential?

14. Attachment M, Air Pollution Control Device Sheet (Baghouse) for B30C, page 2 of 4. Grains/acf in and out should not be marked confidential.
15. **Attachment M, Air Pollution Control Device Sheet (Baghouse) for B33C: Can not be left as TBD. Also once baghouse equipment has been determined, can not be claimed confidential as in No. 10 above.**

Please address the above deficiencies in writing within fifteen (15) days of the receipt of this letter. Application review will not commence until the application has been deemed to be technically complete. Failure to respond to this request in a timely manner may result in the denial of the application. Should you have any questions, please contact me at (304) 926-0499 ext. 1257.

Sincerely,

A handwritten signature in black ink, appearing to read "John Legg", written in a cursive style.

John Legg  
Permit Writer

Pg	Form	Type Equip.	Redacted Information	Comments
1J	Emission Units Table		Design Capacity CFM	
2J	Emission Points Data Summary Sheet		Emission Concentration (mg/M3)	
3J	Emission Points Data Summary Sheet		Inner Diameter (ft)	
4L	Emissions Unit Data Sheet	Chemical Process	Max Hrly & Annual Production	Ends on page 7 of 13 - Where other Pages?
5L	Emissions Unit Data Sheet	Cyclone #1	Name & Amount of Material Charge & Produced	Material not named even on Conf. Version
6L	Emissions Unit Data Sheet	Cyclone #1	PM grains/ACF	
7L	Emissions Unit Data Sheet	Cyclone #2	Name & Amount of Material Charge & Produced	Sheets Out of Order - They follow 10L
8L	Emissions Unit Data Sheet	Cyclone #2	PM grains/ACF	Sheets Out of Order - They follow 10L
9L	Emissions Unit Data Sheet	Rework Filter #1	Amount of Material Charged & Produced	Material named - different that 5L
10L	Emissions Unit Data Sheet	Rework Filter #1	PM grains/ACF	
11L	Emissions Unit Data Sheet	Rework Filter #2	Amount of Material Charged & Produced	Material named - different that 5L
12L	Emissions Unit Data Sheet	Rework Filter #2	PM grains/ACF	
13M	Air Pollution Control Device Sheet	Baghouse #1	Model No.; # of compart.; bag dimen.; tot cloth area; air/cloth ratio; met. of clearing bag; gas flow; gas temp; gas psia; gas temp; fan hp; particulate loading	
14M	Air Pollution Control Device Sheet	Baghouse #1	Particle Size Distribution	
7M	Air Pollution Control Device Sheet	Baghouse #1	pg 3 of 4 -Describe collection disposal system	Not in Index - Marked Redacted in non-conf but not in conf.
15M	Air Pollution Control Device Sheet	Baghouse #1	Sketch - discharge blower hp	
16M	Air Pollution Control Device Sheet	Baghouse #2	Equipment Not Selected; gas flow; gas temp; gas psia; gas temp; fan hp; particulate loading	Same as 13M but Equipment Not Selected - TBD
17M	Air Pollution Control Device Sheet	Baghouse #2	Particle Size Distribution	
18M	Air Pollution Control Device Sheet	Baghouse #2	Sketch - Blower HP	
19N	Calculations		3 pages	Supporting Calculation are Confidential Business Information and are redacted

**TITLE 45  
LEGISLATIVE RULE  
DIVISION OF ENVIRONMENTAL PROTECTION  
OFFICE OF AIR QUALITY**

**SERIES 31  
CONFIDENTIAL INFORMATION**

**§45-31-1. General.**

1.1. Scope. -- This series establishes the requirements for claiming information submitted to the Director as confidential and the procedures for determinations of confidentiality in accordance with the provisions of W. Va. Code §22-5-10.

1.2. Authority. -- W. Va. Code §22-5-1 et seq.

1.3. Filing Date. -- June 27, 1997.

1.4. Effective Date. -- September 25, 1997.

1.5. Repeal of Former Rule. This legislative rule repeals and replaces 45 CSR 31, "Confidential Information" which became effective on July 7, 1993.

**§45-31-2. Definitions.**

2.1. "Director" means the Director of the Division of Environmental Protection or such other person to whom the Director has delegated authority or duties pursuant to W. Va. Code §22-1-1 et seq.

2.2. "Division of Environmental Protection" or "DEP" means West Virginia Division of Environmental Protection created by the provisions of W. Va. Code §22-1-1 et seq.

2.3. "Trade Secrets" may include, but are not limited to, any formula, plan, pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information which is not patented which is known only to

certain individuals within a commercial concern who are using it to fabricate, produce or compound an article or trade or a service or to locate minerals or other substances, having commercial value, and which gives its users an opportunity to obtain business advantage over competitors.

2.4. "Types and amounts of air pollutants discharged" means, with reference to any source of emission of any substance into the air --

2.4.a.

2.4.a.1. Emission data necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

2.4.a.2. Emission data necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner or rate of operation of the source); and

2.4.a.3. A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

2.4.b. Notwithstanding paragraph a of this subsection, the following information shall be considered to be emission data only to the extent necessary to allow the Director to disclose publicly that a source is (or is not) in compliance with an applicable standard or limitation, or to allow the Director to demonstrate the feasibility, practicability, or attainability (or lack thereof) of an existing or proposed standard or limitation:

2.4.b.1. Information concerning research, or the results of research, on any project, method, device or installation (or any component thereof) which was produced, developed, installed, and used only for research purposes; and

2.4.b.2. Information concerning any product, method, device, or installation (or any component thereof) designed and intended to be marketed or used commercially but not yet so marketed or used.

2.5. "Information" means any books, papers, maps, photographs, cards, tapes, recordings or other documentary materials regardless of physical form or characteristics and all air quality data, emission data, and permit applications.

2.6. "Person" means any and all persons, natural or artificial, including the state of West Virginia or any other state, the United States of America, any municipal, statutory, public or private corporation organized or existing under the laws of this or any other state or country, and any firm, partnership, or association of whatever nature.

2.7. "Designee" means a natural person located in the State of West Virginia and identified in the cover document as the designated representative who shall receive notice of the Director's determination of confidentiality in accordance with this rule. Notice shall be deemed sufficient if the Director provides notice to the designee.

### **§45-31-3. Claim of Confidentiality.**

3.1. Made When Information Submitted. A

claim of confidentiality shall be made in accordance with this rule at the time the information claimed to be confidential is submitted to the Director. If no claim of confidentiality is made at the time of submission or is not made in accordance with this rule, the Director may make the information available to the public without further notice.

3.2. Information Previously Submitted. Information claimed as confidential and submitted prior to the effective date of this rule may be made available to the public unless the person who submitted the information establishes their claim of confidentiality in accordance with this rule and within one hundred eighty (180) days of the effective date of this rule.

3.3. Submission of Information Claimed Confidential.

3.3.a. Confidential Information. With the exception of documents of a size greater than 8 ½" x 14", all information that is claimed to be confidential and which is submitted in hardcopy form should be submitted on colored paper in order to readily identify such information. The person submitting the information claimed as confidential shall mark each page with "Claimed Confidential" with the date of such claim of confidentiality.

3.3.b. Justification for Confidentiality in Cover Document. Each submission of information to the Director, any portion of which is claimed to be confidential, shall be accompanied by a cover document which shall be available for public disclosure. The document shall, at a minimum, identify the person making the submission of information claimed as confidential, identify the reason for the submission of information, identify the name, an address in the state of West Virginia, and telephone number of the designee who shall be contacted in accordance with this rule, identify each segment of information within each page that is submitted as confidential, provide the justification for each such segment of information that is claimed confidential, including the criteria

set forth in subsection 4.1, and provide the period of time for which the confidential treatment is desired by the business (e.g., until a certain date, until the occurrence of a specified event, or permanently).

3.3.c. Cover Document as Basis for Review. In the event that a written request for information is received in accordance with W. Va. Code §29B-1-1 et seq., and which triggers a confidentiality determination under this rule, the cover document justifying the claim of confidentiality shall form the basis for the Director's review of the confidentiality claim.

3.4. Redacted Submission of Information Claimed Confidential for Public Disclosure. For each submission of information any portion of which is claimed to be confidential, a complete set of the information, including the document justifying the claim of confidentiality shall be submitted simultaneously on uncolored paper with the information claimed to be confidential blacked out, and with the words "redacted copy - claim of confidentiality" marked clearly on each such page, so that such a set of information is suitable for public disclosure and provides notice to the public that a claim of confidentiality has been made.

3.5. Electronic Media. Information that is claimed to be confidential and which is submitted in electronic form shall be identified as confidential in accordance with the conventions of the applicable software program. Such submissions shall include a cover document meeting all of the requirements of this section regardless of whether that cover document is submitted in electronic form or in hardcopy form. The submitter of information in electronic form that is claimed to be confidential shall provide notice to potential reviewers of the electronic data that information has been redacted from the submission.

#### **§45-31-4. Determination of Confidentiality.**

4.1. In the course of his or her determination of whether the information claimed to be confidential is a trade secret in accordance with

this rule, the Director shall consider the following criteria:

4.1.a. The claim of confidentiality has not expired by its terms, nor been waived or withdrawn;

4.1.b. The person asserting the claim of confidentiality has satisfactorily shown that it has taken reasonable measures to protect the confidentiality of the information, and that it intends to continue to take such measures;

4.1.c. The information claimed confidential is not, and has not been, reasonably obtainable without the person's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding);

4.1.d. No statute specifically requires disclosure of the information; and

4.1.e. Either--

4.1.e.1. The person has satisfactorily shown that disclosure of the information is likely to cause substantial harm to the business's competitive position; or

4.1.e.2. The information is voluntarily submitted information, and its disclosure would likely to impair the State's ability to obtain necessary information in the future.

4.2. Notice of Determination by the Director.

4.2.a. Upon a determination made pursuant to request, the Director shall provide written notice of his or her determination of confidentiality to the designee and to the person requesting the disclosure of confidential information. If the Director determines that disclosure of information claimed confidential shall be made, the notice shall advise the designee and the person requesting disclosure of the

information that will be disclosed, a time not less than ten (10) days from the date the notice was received by the designee, and place at which the person may inspect and copy the documents.

4.2.b. The Director may perform a determination of confidentiality without request, and upon such a determination, the Director shall provide written notice of his or her determination of confidentiality to the designee.

**§45-31-5. Use of Confidential Material by the Director.**

5.1. A claim of confidentiality shall in no way limit the Director in the exercise of his or her powers or duties under the West Virginia Code or any rule promulgated thereunder.

**§45-31-6. Types and Amounts of Air Pollutants Discharged.**

6.1. No person shall claim as confidential, information concerning the types and amounts of air pollutants discharged.

**TITLE 45  
INTERPRETIVE RULE  
BUREAU OF ENVIRONMENT  
DIVISION OF ENVIRONMENTAL PROTECTION  
OFFICE OF AIR QUALITY**

**SERIES 31A  
RELEASE OF PREVIOUSLY SUBMITTED  
CONFIDENTIAL INFORMATION**

**§45-31A-1. General.**

1.1. Scope. -- Series 31A establishes some of the factors to be considered pursuant to WVCSR §45-31-3.2 by the Director in his or her decision whether to release confidential information submitted prior to the effective date of WV45CSR31 (September 25, 1997) in response to a written request for the information in accordance with the West Virginia Freedom of Information Act (W.Va. Code §29B-1-1 et seq.).

1.2. Authority. -- W. Va. Code §§22-5-4; 22-5-10; 29A-1-2(c); and WV45CSR31.

1.3. Filing Date.-- August 19, 1998.

1.4. Effective Date.-- September 21, 1998.

**§45-31A-2. Definitions.**

The definitions set forth in WVCSR §45-31-2 shall apply to this rule as though set forth herein.

**§45-31A-3. Release of Confidential Information.**

3.1. Pursuant to the authority granted in WVCSR §45-31-3.2, the Director will release confidential information submitted to the Office of Air Quality prior to September 25, 1997, in response to a written request for the information only after notifying the person who submitted the confidential information of the request and evaluation of the following factors and in accordance with the following procedures:

3.1.a. Where the person who submitted

such information has, in fact, reviewed the requested information and has submitted a cover document establishing a claim of confidentiality in accordance with WV45CSR31, the Director will use the cover document as a basis for the review of the confidentiality claim and the determination whether to release such information: Provided, That the person who submitted the cover document may submit revisions to the document which the Director shall consider if received within three (3) days of the notice required under subsection 3.1. Upon review of the cover document, the Director may request additional information, if necessary to make the determination whether to release such information to the public. The Director will notify the designee and the person requesting the information of his or her determination in accordance with WVCSR §45-31-4.2.

3.1.b. Where, in the judgment of the Director, the person who submitted such information has made a good faith effort to review the information and to establish a claim of confidentiality in accordance with the requirements of WV45CSR31, but has not been able to complete such process, or documents are identified which were not made available for prior review by the designee under WV45CSR31, the Director will give the person a reasonable time period, depending upon the nature and volume of the requested information, to complete the review of the information and to submit a cover document. Upon review of the cover document, the Director may request any necessary additional information. Such cover document will form the basis of the Director's determination whether to release such information, and the designee and the

person requesting the information will be notified of the determination in accordance with WVCSR §45-31-4.2.

3.1.c. Where, in the judgment of the Director, the person who submitted such information has not made a good faith effort to review the information and to establish a claim of confidentiality, the Director will specify an expedited time period (but in no case less than three [3] days from the time of notice under subsection 3.1) for the person to review such information and submit a cover document to establish a claim of confidentiality. Upon review of the cover document, the Director may request any necessary additional information. The Director will notify the designee and the person requesting the information of his or her determination in accordance with WVCSR §45-31-4.2.

3.2. Should the person who submitted such confidential information not comply with any of the time periods specified by the Director in accordance with subsection 3.1., the Director may release such information after notification in accordance with WVCSR §45-31-4.2.

**TITLE 45  
INTERPRETIVE RULE  
BUREAU OF ENVIRONMENT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF AIR QUALITY**

**SERIES 31B  
CONFIDENTIAL BUSINESS INFORMATION AND EMISSION DATA**

**§45-31B-1. General.**

1.1. Scope. -- Series 31B provides guidance and clarification concerning the term “types and amounts of pollutants discharged” defined under 45CSR§31-2.4, the Department’s legislative rule entitled “Confidential Information,” and thus what information may not be claimed confidential in accordance with 45CSR§31-6.

1.2. Authority. -- W. Va. Code §§22-5-4; 22-5-10; 29A-1-2(c); and WV 45CSR31.

1.3. Filing Date. -- September 10, 2003.

1.4. Effective Date. -- November 10, 2003.

**§45-31B-2. Definitions.**

2.1. “Aggregation” means the combining of individual elements, such as equipment, units, throughputs or capacities, into one total.

2.2. “Categorization” means the combining of individual elements, such as materials or chemicals, into one category.

2.3. “Emission data” or “types and amounts of air pollutants discharged” means, with reference to any source of emission of any substance into the air --

**2.3.a.**

2.3.a.1. Emission data necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any

combination of the foregoing;

2.3.a.2. Emission data necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner or rate of operation of the source); and

2.3.a.3. A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

2.3.b. Notwithstanding subdivision 2.3.a of this subsection, the following information shall be considered to be emission data only to the extent necessary to allow the Secretary to disclose publicly that a source is (or is not) in compliance with an applicable standard or limitation, or to allow the Secretary to demonstrate the feasibility, practicability, or attainability (or lack thereof) of an existing or proposed standard or limitation:

2.3.b.1. Information concerning research, or the results of research, on any project, method, device or installation (or any component thereof) which was produced, developed, installed, and used only for research purposes; and

2.3.b.2. Information concerning any product, method, device, or installation (or any component thereof) designed and intended to be marketed or used commercially but not yet so

marketed or used.

2.4. "Emissions monitoring and sampling" means real-time monitoring, such as continuous emissions monitors, or statistically valid periodic sampling and monitoring that provides reliable and accurate data on emissions.

2.5. "Parametric monitoring" means combining the use of surrogate parameters and monitoring or sampling.

2.6. "Surrogate parameter" means a value that stands in place of throughput, production or some other variable claimed confidential. The term may include an alternative measure of production or throughput or some other production unit that correlates with production or throughput and with emissions. A surrogate parameter must have a simple direct relationship to the value it replaces.

#### **§45-31B-3. Applicability.**

3.1. This rule applies to all information submitted to the Secretary, regardless of the regulatory context, and includes, but is not limited to, information submitted in the permitting, enforcement and emission inventory contexts.

#### **§45-31B-4. What Information Constitutes Emission Data.**

4.1. Information or data that is indispensable or essential to determining emissions or location in accordance with subsection 2.3 will be considered emission data and thus non-confidential, unless there is a readily available non-confidential alternative for determining emissions or location. Where there is no readily available non-confidential alternative, the Secretary may approve non-confidential alternatives through the use of aggregation, categorization, surrogate parameters, emissions monitoring or sampling, or parametric monitoring; provided that such use is consistent with applicable rules and standards and results in a practically enforceable method of determining emissions.

4.2. The data elements and types of information listed in Tables 2A through 2D of

Appendix A to Subpart A of 40 C.F.R. Part 51, as further defined in the Glossary in such Appendix, will be considered emission data if the information is found to be necessary to determine emissions or location in accordance with subsection 4.1.

4.3. Information in addition to that listed in the Tables referenced in subsection 4.2 will also be deemed emission data if the information is found to be necessary to determine emissions or location in accordance with subsection 4.1.

4.4. The determination as to what information constitutes emission data will be made by the Secretary on a case-by-case basis upon application of the provisions stated in this rule.

#### **§45-31B-5. Contents of Permit.**

5.1. The contents of any permit issued by the Secretary pursuant to 45CSR13, 45CSR14, 45CSR19 or 45CSR30 may not be claimed as confidential. This does not, however, preclude a permit application from containing confidential information.

#### **§45-31B-6. Information Determined Emission Data by EPA.**

6.1. Notwithstanding the provisions of this rule, information and data determined to be emission data by EPA in accordance with 40 C.F.R. §2.301 will be deemed emission data by the Secretary; provided that the mere inclusion of information or data in Tables 2A through 2D of Appendix A to Subpart A of 40 C.F.R. Part 51 shall not be considered a determination for purposes of this section where EPA has not made a case-specific determination of confidentiality.

Legg, John C

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**From:** Legg, John C  
**Sent:** Monday, June 29, 2015 5:34 PM  
**To:** 'Gaston, Mark'  
**Subject:** RE: WV DAQ Permit Application Status for Kuraray America Inc; Washington facility  
**Attachments:** cbi checklist pg1.pdf; cbi checklist pg2.pdf

6/29/15

Mark,

Attached is a CBI checklist.

Please read through the checklist and let me know if you think you complied with it – in particular 5) A.

John Legg  
Permit Writer  
WVDEP  
Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
(304) 926-0499 ext. 1257  
[John.c.legg@wv.gov](mailto:John.c.legg@wv.gov)

---

**From:** Gaston, Mark [<mailto:Mark.Gaston@kuraray.com>]  
**Sent:** Wednesday, June 24, 2015 4:11 PM  
**To:** Adkins, Sandra K  
**Cc:** Ross Crews; Shockey, Christopher; Legg, John C  
**Subject:** RE: WV DAQ Permit Application Status for Kuraray America Inc; Washington facility

6/24/15

Ms. Adkins,

This is to address the three items you raised in regard to our application for a modification to our permit R13-1230 that we submitted to the WV-DAQ last week.

- I regard to the affidavit for the Class I legal advertisement, the advertisement had not yet run at the time the application was submitted, on June 16<sup>th</sup>. The advertisement appeared in the June 18<sup>th</sup> edition of the Parkersburg News and Sentinel. I have sent by certified mail the affidavit for the publication to John C. Legg, the Technical Analyst assigned to review this application earlier today (June 24<sup>th</sup>).
- You did not specify what are the issues with the information designated as business confidential in the application and in the Confidential Business Information letter (M. H. Gaston to J. P. Fedczak, June 16<sup>th</sup>, 2015) submitted with the application.
- The emission calculations were included in the application as Attachment N. Per your email, some follow-up work will be required to determine what portion of these can be confidential.

I have called Mr. Legg today in regard to the second and third items above. So far I have not been able to reach him. I have left a call back message on his voice mail. As soon as I know what the issues are with the CBI and the calculations, I will work with Mr. Legg to address these so that the completeness review can proceed as expeditiously as possible.

Sincerely,

Mark H. Gaston  
Sr. Environmental Consultant  
Kuraray America, Inc.  
Parkersburg, WV Plant  
Email: [Mark.Gaston@kuraray.com](mailto:Mark.Gaston@kuraray.com)  
304-210-9192

**From:** Adkins, Sandra K [<mailto:Sandra.K.Adkins@wv.gov>]  
**Sent:** Tuesday, June 23, 2015 1:25 PM  
**To:** Ross Crews; Gaston, Mark  
**Cc:** Legg, John C; McKeone, Beverly D  
**Subject:** WV DAQ Permit Application Status for Kuraray America Inc; Washington facility

**RE: Application Status  
Kuraray America Inc.  
Washington Facility  
Plant ID No. 107-00181  
Application No. R13-1230A**

Mr. Crews,

Your application for a modification permit for the Washington facility was received by this Division on June 17, 2015, and was assigned to John Legg. The following items were not included in the initial application submittal:

**Original affidavit for Class I legal advertisement not submitted.**

**Confidential Business Information is not properly identified.**

**Emission calculations not included – emission factors, references, source identification, numbers, etc.**

***\*Emission calculations CANNOT be claimed confidential***

*These items are necessary for the assigned permit writer to continue the 30-day completeness review.*

Within 30 days, you should receive a letter from John Legg stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, John Legg, at 304-926-0499, extension 1257.

6/29/15

**COMPLETENESS DETERMINATION –  
CONFIDENTIAL BUSINESS INFORMATION  
(CBI)**

		YES	NO
M/4.51)	Has each page of CBI been marked "Claimed Confidential" and dated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
but non-CBI	2) Is CBI submitted on colored paper? (Only applies to documents the size of 8½" x 11" or less.) <i>also submitted on colored paper!</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	3) Has applicant submitted a cover document containing the following information:		
✓	A. Identity of person making submission;	<input type="checkbox"/>	<input type="checkbox"/>
✓	B. Reason for submission;	<input type="checkbox"/>	<input type="checkbox"/>
✓	C. Name, address in State of West Virginia and telephone number of designee who shall be contacted in accordance with §45CSR31-3.3.b.;	<input type="checkbox"/>	<input type="checkbox"/>
✓	D. Identification of each segment of information claimed confidential;	<input type="checkbox"/>	<input type="checkbox"/>
✓	E. Period of time confidential treatment desired; and	<input type="checkbox"/>	<input type="checkbox"/>
✓	F. Signature of responsible official or an authorized representative.	<input type="checkbox"/>	<input type="checkbox"/>
	4) Has applicant provided justification that the following criteria have been met:		
✓	A. The claim of confidentiality has not expired by its terms, nor been waived or withdrawn;	<input type="checkbox"/>	<input type="checkbox"/>
✓	B. The person asserting the claim of confidentiality has satisfactorily shown that it has taken reasonable measures to protect the confidentiality of the information, and that it intends to continue to take such measures;	<input type="checkbox"/>	<input type="checkbox"/>
✓	C. The information claimed confidential is not, and has not been, reasonably obtainable without the person's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding);	<input type="checkbox"/>	<input type="checkbox"/>
?	D. No statute specifically requires disclosure of the information; and	<input type="checkbox"/>	<input type="checkbox"/>
✓	E. Either --		
	(i) The person has satisfactorily shown that disclosure of the information is likely to cause substantial harm to the business's competitive position; or	<input type="checkbox"/>	<input type="checkbox"/>

YES NO

✓

(ii) The information is voluntarily submitted information, and its disclosure would be likely to impair the State's ability to obtain necessary information in the future.

5) A. Has applicant submitted CBI in a "redacted" format, i.e., a complete set of the information on white paper with the CBI blacked or whited out and the words "Redacted Copy - Claim of Confidentiality" marked on each page which contains confidential information?

NO

B. If CBI is included in a drawing or blueprint, has applicant submitted a "redacted" copy with the words "Redacted Copy - Claim of Confidentiality" marked on each page and the legend or title of the drawing included on each page? (Redacted copy may be 8 1/2" x 11" in size)

N/A

6) Does information claimed CBI include any "emission data"? (See definition of "types and amounts of air pollutants discharged" in §45CSR31 and §45CSR31B and any DAQ guidance).

If "YES", that information may not be claimed CBI.

**NOTE:**

If any of the above-required elements has been omitted, notify applicant of omission(s) when informing applicant of the Completeness Determination associated with the permit.

**RECOMMENDATION:**

Based upon my review of the attached information claimed CBI and after verification that each of the required elements listed above has been included in the information, I believe the applicant has made a credible showing that a trade secret is in jeopardy, and I therefore recommend that the Division of Air Quality treat such information as "Confidential".

\_\_\_\_\_  
SIGNATURE

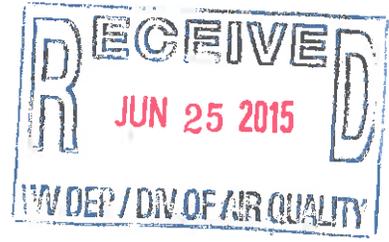
\_\_\_\_\_  
DATE

If the permit engineer is unable to make the above recommendation, explain below how the submitted information is deficient and notify applicant of such deficiency, giving applicant an opportunity to remedy, or discuss such deficiency with supervisors and counsel.

6/25/15

R13-1230A

Id. No. 107-00181 Reg. ~~1111~~  
Company Kuraray Washington Works  
Facility Washington Region 2  
Initials JL Legg



June 24, 2015

**Certified Mail -**  
**Return Receipt Requested**

Mr. James P Fedczak, II, Engineer Chief  
Division of Air Quality  
WV Department of Environmental Protection  
601 57th Street, SE  
Charleston, WV 25304

RE: Affidavit of Legal Notice Publication  
REF: Permit R13-1230A

Dear Mr. Fedczak:

Enclosed is an affidavit confirming publication of a "Legal Notice" in the Parkersburg News on June 18, 2015, as required by WV Regulation 45CSR13. The notice contained information regarding a permit modification for existing and new facilities located at this site.

Please contact me at (304) 210-9192 if there is anything further needed to complete the processing of this application.

Sincerely,

Mark H. Gaston  
Senior Environmental Consultant  
Kuraray Washington Works

Enclosure

DFA:ces/vlw

**AIR QUALITY PERMIT  
NOTICE  
Notice of Application**

Notice is given that Kuraray America, Inc has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Modification to their existing 1990 R19 Permit for a product drying expansion. The plant is located on 8480 DuPont Road, in Washington, in Wood County, West Virginia. The latitude and longitude coordinates are: 39.2350 degrees north latitude, 81.6677 degrees west longitude.

The applicant estimates the increased potential to discharge the following Regulated Air Pollutants will be:

PM (particulate) 4.0 tons/yr  
VOC (propylene glycol) 0.39 ton/yr

Startup of operation is planned to begin on or about the first day of August 2017. Written comments

will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th 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 1250, during normal business hours.

Dated this the 17TH day of June, 2015.

By: Kuraray America, Inc  
Mark H. Gaston  
Sr. Environmental Consultant  
8480 DuPont Road  
Washington, WV 26181

Jun 18

.....MARY J BUCK.....

Being first duly sworn, says that the

“AIR QUALITY PERMIT NOTICE” .....

Hereto attached was printed in the

..XX...The Parkersburg News and Sentinel,

.....The Marietta AM,

A daily newspaper published in the City of Parkersburg,

Wood County, West Virginia, for ...ONE..... successive

Week(s), the first publication and posting thereon being on

the ..... 18TH..... day of ...JUNE..... 2015., and

subsequent publication on the .....

day (s) ..... 2015....

Printer's Fee \$...36.40...

Notarized Signature \$....2.00...

Additional Copy Fee \$.....

Total Due: \$....38.40...

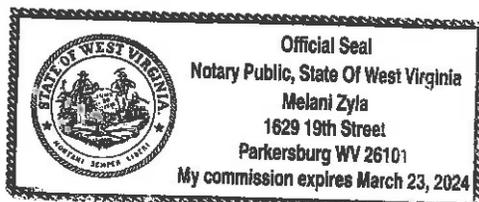
By: *Mary J Buck* .....

Subscribed and sworn to before me this

*18th* day of *June* 20*15*.

*Melani Zyla*  
.....  
Notary Public for Wood County, West Virginia

My commission expires *3-23-24* .....



6/23/15

Legg, John C

**From:** Adkins, Sandra K  
**Sent:** Tuesday, June 23, 2015 1:25 PM  
**To:** ross.crews@kuraray.com; mark.gaston@kuraray.com  
**Cc:** Legg, John C; McKeone, Beverly D  
**Subject:** WV DAQ Permit Application Status for Kuraray America Inc; Washington facility

**RE: Application Status**  
**Kuraray America Inc.**  
**Washington Facility**  
**Plant ID No. 107-00181**  
**Application No. R13-1230A**

Id. No. \_\_\_\_\_ Reg. \_\_\_\_\_  
Company \_\_\_\_\_  
Facility \_\_\_\_\_ Region 2  
Initials J.C. Legg

Mr. Crews,

Your application for a modification permit for the Washington facility was received by this Division on June 17, 2015, and was assigned to John Legg. The following items were not included in the initial application submittal:

**Original affidavit for Class I legal advertisement not submitted.**

**Confidential Business Information is not properly identified.**

**Emission calculations not included – emission factors, references, source identification, numbers, etc.**  
*\*Emission calculations CANNOT be claimed confidential*

*These items are necessary for the assigned permit writer to continue the 30-day completeness review.*

Within 30 days, you should receive a letter from John Legg stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, John Legg, at 304-926-0499, extension 1257.

✓

R13-1230A Modification  
107-00181 John 6/23/15

### 45CSR13 Administrative Update, Construction, Modification, Relocation, Temporary Permit or General Permit Registration Incomplete Application

A complete application is demonstrated when all of the information required below is properly prepared, completed and attached. The items listed below are required information which must be submitted with a 45CSR13 permit application. Any submittal will be considered incomplete if the required information is not included. The applicant must submit a complete application in order to receive a 45CSR13 permit.

- Class I legal advertisement not published in a newspaper certified to accept legal advertisements and original affidavit submitted.
- Application fee AND/OR additional application fees not included:
  - \$250 Class I General Permit
  - \$300 Class II Administrative Update
  - \$1,000 Construction, Modification, Relocation or Temporary Permit
  - \$500 Class II General Permit
  - \$1,000 NSPS
  - \$2,500 NESHAP
  - \$2,500 45CSR27 Pollutant
  - \$5,000 Major Modification
  - \$10,000 Major Construction
- Original and two (2) copies of the application not submitted.
- File organization – application pages are not numbered or in correct order, application is not bound in some way, etc.
- Confidential Business Information is not properly identified.
- General application forms not completed and signed by a responsible official.
- Authority of Corporation form not included – required if application is signed by someone other than a responsible official.
- Applicant is not registered with the West Virginia Secretary of State's Office.
- Copy of current Business Registration Certificate not included.
- Process description, including equipment and emission point identification numbers, not submitted.
- Process flow diagram, including equipment and emission point identification numbers, not submitted.
- Plot plan, including equipment and emission point identification numbers, not submitted.
- Applicable technical forms not completed and submitted:
  - Emission Point Data Summary Sheets
  - Emission Unit Data Sheets
  - Air Pollution Control Device Sheets
  - Equipment List Form
- Emission calculations not included – emission factors, references, source identification, numbers, etc. *Emission Calculations Can NOT Be Claimed Confidential*
- Electronic submittal diskette not included.

6/23/15



**Permit / Application Information Sheet**  
**Division of Environmental Protection**  
**West Virginia Office of Air Quality**

<b>Company:</b>	Kuraray America, Inc.	<b>Facility:</b>	Washington
<b>Region:</b>	2	<b>Plant ID:</b>	107-00181
<b>Application #:</b>	13-1230A		
<b>Engineer:</b>	Legg, John	<b>Category:</b>	Chemical
<b>Physical Address:</b>	8480 DuPont Road Washington WV 26181	<b>SIC: [2821] CHEMICALS AND ALLIED PRODUCTS - PLASTICS MATERIALS AND RESINS</b> <b>NAICS: [325211] Plastics Material and Resin Manufacturing</b>	
<b>County:</b>	Wood	<b>SIC: [2824] CHEMICALS AND ALLIED PRODUCTS - ORGANIC FIBERS, NONCELLULOSIC</b> <b>NAICS: [325222] Noncellulosic Organic Fiber Manufacturing</b>	
<b>Other Parties:</b>	PLT_MGR - Crews, E. Ross 910-433-7117 Contact - Gaston, Mark 304-210-9192		

<b>Information Needed for Database and AIRS</b> 1. Need valid physical West Virginia address with zip 2. Air Program 3. Inspection result 4. Pollutant and class
--

**Regulated Pollutants**

<b>Summary from this Permit 13-1230A</b>		
<b>Air Programs</b>	<b>Fee</b>	<b>Applicable Regulations</b>
Fee Program	\$1,000.00	Application Type MODIFICATION

**Notes from Database**

<b>Activity Dates</b>	
APPLICATION RECEIVED	06/17/2015
APPLICATION FEE PAID	06/23/2015
ASSIGNED DATE	06/23/2015

**NON-CONFIDENTIAL**

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 107-00181  
 Company: Kuraray America, Inc.  
 Printed: 06/23/2015  
 Engineer: Legg, John

~~6/17/15~~  
6/17/15



Kuraray America, Inc.  
Washington Works Plant  
8480 DuPont Road  
Washington, WV 26181

CERTIFIED MAIL –  
RETURN RECEIPT REQUESTED

June 14, 2015

Mr. James P Fedczak, II, Engineer Chief  
Division of Air Quality  
WV Department of Environmental Protection  
601 57th Street, SE  
Charleston, WV 25304

Id. No. 107-00181 Reg. R13-1230A  
Company Kuraray  
Facility Washington Works Region 2  
Initials J.P. Legg

Dear Mr. Fedczak:

COVER DOCUMENT FOR CONFIDENTIAL INFORMATION  
PVB Resin Drying Area - Permit R13-1230  
Permit Modification – Construct Second Resin Drying Line

In accordance with 45CSR31 sections 3.2 and 3.3, this letter serves as the cover document for confidential information being submitted this date by Kuraray America Inc. to the Division of Air Quality [DAQ] pertaining to the subject file/matter. The "Claimed Confidential" information for the calculations, production information, and process descriptions should permanently be maintained in a confidential file until declassified by Kuraray. Section 10, Article 5, Chapter 22 of the West Virginia Code, as amended, allows the designation of documents as confidential.

The confidential section (Attachment) provides a description of the process technology changes and process rate information used in the calculation of emissions. This modification is associated with the process area currently covered by Permit R13-1230.

Reasons for confidentiality of the submitted pages, required by Section 4.1(e)(1) are detailed in the attachment using the following numbers:

1. Process technology-Disclosure of this information would compromise competitive advantage since it describes the interaction of the various unit operations involved in the manufacture of a proprietary, marketable product.
2. Process Rates-Disclosure of this information would be harmful to the business in three areas-competitive advantage, cost advantage, and technological advantage-all three are important to the continued financial health and future survival of the business.
3. Ingredients-Disclosure of this information would cause harm because these allow the product to exhibit specific properties that differentiate it, and make it superior, from a competitive standpoint.

6/14/5

To satisfy the requirements specified in Section 4.1.a, we are stating that the claim of confidentiality has not expired by its terms, nor been waived or withdrawn.

To satisfy the requirements specified in Section 4.1.b, we are stating that the information claimed as confidential is not available to the general public and it is not reasonably obtainable within Kuraray without the consent of a business manager. All employees are aware of the competitive nature of their businesses and are trained in the guarding of confidential information. When printed, the information has a cover indicating it is confidential and the pages within are so stamped. When such documents are handled internally, they must be kept under the person's control and not left unattended in full view. Access to confidential documents is limited to those personnel with a "need-to-know".

To maintain the confidentiality of such information as required by Section 4.1.c, Kuraray employees involved with confidential information such as flow sheets, calculations, stream concentrations, ingredients, and equipment design or capacity sign a confidentiality agreement as stipulated by Kuraray legal advisors. Transmission of such information is sent by courier, certified mail, or secure (encrypted) electronic systems, with common electronic transmission restricted to avoid interception of the information by competitor or foreign governments.

There is no statute that has been reviewed that requires the disclosure of information claimed as confidential.

The confidential information designee who can be contacted about the information is the undersigned.

If you have questions or need additional information concerning the claim of confidentiality, please contact me at (304) 210-9192.

Sincerely,



Mark H. Gaston

Sr. Environmental Consultant  
Kuraray America, Inc.  
Washington Works Plant  
Email: Mark.Gaston@kuraray.com  
304-210-9192

Enclosures

~~6/17/15~~

6/17/15

**Attachment**  
**Index of Sheets Claimed Confidential**

	<b>Appendix /Page number</b>	<b>Reason Code</b>
1	<u>I Pg 1</u>	<u>1, 2</u>
2	<u>J Pg 1</u>	<u>1</u>
3	<u>J Pg 3</u>	<u>2</u>
4	<u>L (EUDES Chemical Process) Pg 1</u>	<u>2</u>
5	<u>L (EUDES Cyclone #1) Pg 1</u>	<u>1, 2</u>
6	<u>L (EUDES Cyclone #1) Pg 3</u>	<u>1</u>
7	<u>L (EUDES Cyclone #2) Pg 1</u>	<u>1, 2</u>
8	<u>L (EUDES Cyclone #2) Pg 3</u>	<u>1</u>
9	<u>L (ECDS Rework Filter #1) Pg 1</u>	<u>1, 2</u>
10	<u>L (ECDS Rework Filter #1) Pg 3</u>	<u>1</u>
11	<u>L (ECDS Rework Filter #2) Pg 1</u>	<u>1, 2</u>
12	<u>L (ECDS Rework Filter #2) Pg 3</u>	<u>1</u>
13	<u>M (APCD Baghouse #1) Pg 1</u>	<u>1</u>
14	<u>M (APCD Baghouse #1) Pg 2</u>	<u>1, 3</u>
15	<u>M (APCD Baghouse #1) Pg 5 (sketch)</u>	<u>1</u>
16	<u>M (APCD Baghouse #2) Pg 1</u>	<u>1</u>
17	<u>M (APCD Baghouse #2) Pg 2</u>	<u>1, 3</u>
18	<u>M (APCD Baghouse #2) Pg 5 (sketch)</u>	<u>1</u>
19	<u>N</u>	<u>1, 2</u>

3

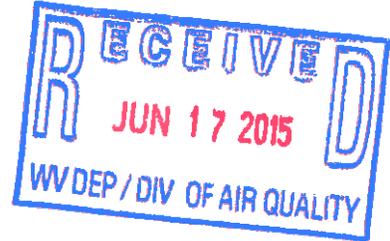
→ #

→ #

6/17/15



Kuraray America, Inc.  
Washington Works Plant  
8480 DuPont Road  
Washington, WV 26181



CERTIFIED MAIL –  
RETURN RECEIPT REQUESTED

June 14, 2015

Mr. James P Fedczak, II, Engineer Chief  
Division of Air Quality  
WV Department of Environmental Protection  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304

Id. No. 107-00181 Reg. R13-1230A  
Company Kuraray Washington Works  
Facility Washington Region 2  
Initials J C Legg

Dear Mr. Fedczak:

Attached is a permit application to modify permit R13-1230 for the PVB resin drying area at Kuraray America, Inc. Washington Works facility, to construct a second PVB resin drying line. Total potential emissions increase from this modification will be 4.39 tons per year.

Data which we request be kept confidential have been placed in a separate confidential letter, in accordance with procedures used in pervious permit applications.

A check payable to the WV-DEP for the \$1000 permit application fee has been sent *via* certified mail from Kuraray headquarters in Houston TX on June 11<sup>th</sup>, 2015.

We will place a legal notice of this application in the Parkersburg News and Sentinel, a local newspaper to be run on June 17<sup>th</sup> 2015. We will forward an affidavit to that effect.

Sincerely

Mark H. Gaston

Sr. Environmental Consultant  
Kuraray America, Inc.  
Washington Works Plant  
Email: Mark.Gaston@kuraray.com  
304-210-9192