

Memo to File

To: Bev McKeone
From: Mike Egnor
Date: October 25, 2016
Re: PD 16-060 • DuPont • Washington Works • 107-00001

This office received a permit determination request from DuPont October 24, 2016 and dated October 21, 2016. The determination request is to replace in-kind a pair of storage tanks in the Salt Section of the Zytel nylon resins production facility covered by permits R13-0985 and R30-10700001-2011 Part 5 of 14. Tanks 13-14 were replaced in-kind in 2015 using the previously existing Tanks 11-12. The determination included emission changes resulting from a recalculation from EPA's AP-42 factors to a more accurate use of EPA's Tanks 4.09 software application.

The previous calculations for Tanks 13-14 were 0.45 lbs/yr (0.00023 TPY) under the EPA's AP-42 factor. The corrected calculations for Tanks 11-12 are 0.68 lbs/yr (0.00034 TPY). The limit for these tanks is 267 lbs/yr.

NSPS Subpart Kb for the storage tanks do not apply to the replacement of the vessel. Although the combined capacity of the two compartments (29,800 gal or 110.5 m³) is above the volume threshold of 75 cubic meters, the maximum true vapor pressure for the vessel (0.00013 psia or 0.0009 kPa) is below the applicability threshold of 15.0 kPa.

Therefore, no permit is needed for the replacement in-kind of Tanks 13-14 with Tanks 11-12.

Evaluation Comments:

The R30-10700001-2011 Part 5 of 14 Title V Permit needs to be updated to reflect the changes of this Permit Determination.