

Fact Sheet



*For Draft/Proposed Renewal Permitting Action Under 45CSR30 and
Title V of the Clean Air Act*

Permit Number: **R30-10700001-2010 (Part 1 of 14)**

Application Received: **October 14, 2009**

Plant Identification Number: **10700001**

Permittee: **E. I. du Pont de Nemours & Co.**

Facility Name: **Washington Works**

Business Unit: **Acrylic Resin Production (Part 1 of 14)**

Mailing Address: **P. O. Box 1217, Washington, WV 26181-1217**

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 442.368 km Easting • 4,346.679 km Northing • Zone 17
Directions: From I-77, take the Route 50 bypass around Parkersburg towards Ohio. Take the last exit prior to the bridge exit from the Route 50 Bypass onto DuPont Road. At the light turn left onto DuPont road. The facility is on the right approximately ½ miles from the turn.

Facility Description

In the Acrylic Resin Manufacturing Unit, various raw materials are received from vendors and are used to polymerize polyacrylate bead that is then isolated from the reaction mass, dried, and packaged for shipment to customers.

Emissions Summary

Acrylic Resin Production (Part 1 of 14) Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2008 Actual Emissions
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO _x)	0	0
Particulate Matter (PM ₁₀)	12.25	0.74
Total Particulate Matter (TSP)	112.5	3.21
Sulfur Dioxide (SO ₂)	0	0
Volatile Organic Compounds (VOC)	7.21 ^{1,2}	17.13 ²

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2008 Actual Emissions
Methyl Methacrylate	5.65 ¹	2.68
Ethyl Acrylate	1.031 ¹	0.73
Methanol	0 ²	13.39 ²
Acrylic Acid	0.019	0
Methylene Chloride	0.001	0

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

¹DuPont made changes to emission point A290E which reduced VOC, methyl methacrylate, and ethyl acrylate emissions. Since this was an emission reduction, emission rate changes to R13-0181C were never requested by DuPont. For this reason, it appears that the potential to emit for VOC, methyl methacrylate, and ethyl acrylate, if calculated based on the R13-0181C emission limits, would be higher than reported in the table above.

²DuPont determined in late 2009 that methanol emissions were actually higher than the R13-0181C permitted rates and implemented a plan (starting in 4th quarter 2009) to eliminate methanol emissions from the process. The potential methanol emissions are now zero and the potential VOC emissions have decreased relative to the amount of methanol emissions eliminated. The 2008 actual emissions for both VOC and methanol were based on the new calculation method which provided the higher methanol emission rates and the potential to emit was based on the current potential to emit which considers the elimination of methanol from the process; therefore, the 2008 actual VOC and methanol emissions exceed their potentials to emit.

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 45CSR7 45CSR11 45CSR13 WV Code § 22-5-4 (a) (14) 45CSR§21-30 45CSR30 45CSR34 40 C.F.R. Part 61 40 C.F.R. 63, Subpart FFFF 40 C.F.R. Part 82, Subpart F 40 C.F.R. Part 98	Open burning prohibited. Particulate matter and opacity limits for manufacturing sources. Standby plans for emergency episodes. Preconstruction permits for minor sources. The Secretary can request any pertinent information such as annual emission inventory reporting. Control of VOC emissions from cold and solvent metal cleaning. Operating permit requirement. Emission Standards for Hazardous Air Pollutants. Asbestos inspection and removal Miscellaneous organic chemical manufacturing (MON) MACT. Ozone depleting substances Mandatory Greenhouse Gas Reporting
State Only:	45CSR4 45CSR§21-40 45CSR27 45CSR42	No objectionable odors. Control of VOC emissions Best Available Technology (BAT) for HAPs Greenhouse Gas Reporting

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, 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>)
R13-0181C	October 12, 2005	None
R13-2617D	July 27, 2010	None

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

Title V Administrative Amendments/Title V Modifications/R13 Changes

The initial Title V Permit for R30-10700001-2003 (Part 1 of 14) was issued on April 14, 2005. Since then, the Title V permit has undergone the following administrative amendments, modifications, and R13 changes.

- 1) **R30-10700001-2003 (Part 1 of 14) - MM01 issued on January 31, 2006.** This minor modification permit incorporated changes approved under R13-0181C, issued on October 12, 2005. R13-0181C corrected calculation errors which resulted in underestimated controlled and uncontrolled maximum emissions rates for storage tanks in the Acrylic Resin Production Area.
- 2) **R30-10700001-2003 (Part 1 of 14) – AA01 issued on December 4, 2006.** This administrative amendment updated the 40 C.F.R. 63, Subpart FFFF compliance date from November 10, 2006 to May 10, 2008 due to rule changes and also added additional language to clarify the significant modification timeline for incorporating the Subpart FFFF requirements.
- 3) **R30-10700001-2003 (Part 1 of 14) – MM02 issued on May 2, 2007.** This minor modification permit incorporated requirements from R13-2617B. R13-2617B, issued on September 29, 2006, was a site-wide permit which included the site-wide applicable requirements of 45CSR§21-40 and 45CSR27 and superseded and replaced Consent Orders CO-R21-97-47 and CO-R27-92-19.
- 4) **R30-10700001-2003 (Part 1 of 14) – SM01 issued on April 27, 2009.** This significant modification permit incorporated the applicable requirements of 40 C.F.R. 63, Subpart FFFF – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.”
- 5) **PD10-044 issued on July 22, 2010.** This permit determination was for the reactivation of storage tank A130.6S to replace a smaller storage tank, A130.5S, used to store n-Dodecyl Mercaptan (n-DDM). A130.5S will be taken out of service once the change takes place. The permit determination did not result in an increase in emissions and it did not affect any conditions from R13-0181C.

Other Changes to the Title V Permit

The following is a listing of the changes which have been incorporated into this Title V Permit Renewal.

- 1) **Removal of Emission Sources no longer in service.** Emission Sources A120S, A130.1S, A130.4S, A270S, A290.3S, and A480S have been taken out of service, therefore they were not included in the Section 1.1 Emission Units Table. Although these sources are no longer in service, the R13-0181C requirements for these sources were left in the Title V permit as well as in the example recordkeeping forms from R13-0181C which are provided in Appendix A. DuPont plans to submit changes to R13-0181C and the Title V permit in the near future and will address these obsolete permit conditions at that time.
- 2) **Idled Emission Sources A050S and A190S were noted in the Section 1.1 Emission Units Table.** DuPont is in the process of eliminating methanol emissions from the Acrylic Resin Production process. As a result, Emission Sources A050S and A190S have been idled. Although these sources have been idled in the Emission Units Table in Section 1.1 of the Title V permit, the R13-0181C requirements were left in the permit and in the recordkeeping forms provided in Appendix A. Once methanol elimination from the process can be completed, a revision to R13-0181C and the Title V permit will be submitted to address the changes.

- 3) **Added emission sources A110.1S and A191S to the Section 1.1 Emission Units Table.** PD09-072 was submitted on December 18, 2009 for the reactivation of tank A191S as a run tank to hold a catalyst-in-water suspension. Because this tank had no emissions, DAQ determined on January 6, 2010 that a permit was not needed. PD10-012 for the reactivation of vessel A110.1S to provide storage of methacrylic acid was submitted on February 12, 2010. On February 22, 2010, it was determined that no permit was needed for A110.1S because there was no increase in emissions.
- 4) **Included changes resulting from the issuance of R13-2617D.** R13-2617D was issued on July 27, 2010 and updated the Attachment A listing of 45CSR21 and 45CSR27 sources.
- 5) **Added Greenhouse Gas Reporting Requirements.** DuPont is subject to the new greenhouse gas reporting requirements of 45CSR42. These requirements were added as conditions 3.1.13 and 3.5.11.

40 C.F.R. 63, Subpart FFFF Requirements (MON MACT)

The initial Title V permit contained several MON MACT requirements which were not included in this Title V Permit Renewal. In cases where multiple compliance options were listed or when there were references to performance tests, design evaluations, and establishment of operating parameters, these conditions were replaced with the specific applicable requirements based on the amended Notification of Compliance Status (NOCS) Report, dated March 18, 2010. Also, in the case of the Group 1 storage tanks, applicable MACT requirements were included, except where those requirements will be affected by the alternative monitoring request required to be submitted as part of the compliance plan in Condition 4.6.1. Once EPA makes a decision on the alternative monitoring request, DuPont will be required by Condition 4.6.2 to submit a significant modification. Once the significant modification application is submitted, the MON MACT requirements for the Acrylic Resin Production Area should be re-evaluated to ensure that all applicable requirements for the Group 1 storage tanks are included along with the specific operating parameters of the control devices.

Discussion of Applicable 40 C.F.R. 63, Subpart FFFF Requirements (MON MACT)

Continuous Process Vents

For a gas stream to be defined under 40 C.F.R. §63.2550 as a continuous process vent, it must contain greater than 0.005 weight percent (50 ppm_w) total HAP. For each gas stream identified as a continuous process vent, a determination is then made as to whether it is a Group 1 continuous process vent or a Group 2 continuous process vent. A Group 1 continuous process vent is defined by 40 C.F.R. §63.2550 as a continuous process vent for which the flow rate is greater than or equal to 0.005 standard cubic meter per minute, and the total resource effectiveness index value, calculated according to 40 C.F.R. §63.2455(b), is less than or equal to 1.9 at an existing source and less than or equal to 5.0 at a new source. A Group 2 continuous process vent is defined by 40 C.F.R. §63.2550 as a continuous process vent that does not meet the definition of a Group 1 continuous process vent. In their revised NOCS Report, dated March 18, 2010, DuPont identified the following continuous process vents in Acrylic Resin Production: A350E, A390.1E, and A390.2E. Since the TRE for these existing sources are greater than 1.9, these sources are Group 2 continuous process vents.

Batch Process Vents

A batch process vent is defined by 40 C.F.R. §63.2550 as a vent from a unit operation, or vents from multiple unit operations, within a process that are manifolded together into a common header, through which a HAP-containing gas stream is, or has the potential to be, released to the atmosphere. Examples of batch process vents include, but are not limited to, vents on condensers used for product recovery, reactors, filters, centrifuges, and process tanks. However, a batch process vent does not include emission streams from emission episodes that are undiluted and uncontrolled and contain less than 50 ppm_v HAP. Also, a vent from a unit operation or a vent from multiple unit operations that are manifolded together, and have total uncontrolled HAP emissions less than 200 lb/yr are not a batch process vent. A Group 1 batch process vent is a batch process vent in a process for which the collective uncontrolled organic HAP emissions from all of the batch process vents are greater than or equal to 10,000 lb/yr at an existing source or greater than or equal to 3,000 lb/yr at a new source. A Group 2 batch process vent is a batch

process vent that does not meet the definition of a Group 1 batch process vent. In their NOCS Report, DuPont did not have any Group 1 batch process vents, but did identify the following Group 2 batch process vents: A290E, A300E, A450E, A310E, and A320E.

Hydrogen Halide and Halogen HAP or HAP Metals for Continuous and Batch Process Vents

For each process vent (continuous and batch), DuPont was then required by 40 C.F.R. §63.2465 to determine and sum the uncontrolled hydrogen halide and halogen HAP emissions from each of the process vents within a process. If the collective uncontrolled hydrogen halide and halogen HAP emissions from the process vents within the process were greater than or equal to 1,000 lb/yr, then the permittee was required to reduce emissions in accordance with Table 3 of 40 C.F.R. 63, Subpart FFFF. In their NOCS Report, DuPont did not identify any process vents containing hydrogen halide and halogen HAPs.

Storage Tanks

A storage tank is defined under 40 C.F.R. §63.2550 as a tank or other vessel that is used to store liquids that contain organic HAP and/or hydrogen halide and halogen HAP and that has been assigned to an MCPU, but it does not include vessels which store organic liquids that contain HAP only as impurities. A Group 1 storage tank is defined by 40 C.F.R. §63.2550 as a storage tank with a capacity greater than or equal to 10,000 gallons storing material that has a maximum true vapor pressure of total HAP greater than or equal to 6.9 kilopascals at an existing source or greater than or equal to 0.69 kilopascals at a new source. A Group 2 storage tank is a storage tank that does not meet the definition of a Group 1 storage tank. DuPont identified the following Group 1 storage tanks in the Acrylic Resin Production Area: Ethyl Acrylate Storage Tank 1A (A010.1S) and Ethyl Acrylate Storage Tank 1B (A010.2S). Each of these storage tanks have a capacity of more than 10,000 gallons and store a material with a maximum true vapor pressure of more than 6.9 kilopascals, but less than 76.6 kilopascals.

Emissions from A010.1S and A010.2S are vented to a carbon canister, A010C. According to the NOCS (dated October 6, 2008) and amended NOCS (dated March 18, 2010), the control device efficiency is greater than 95% which meets the requirements under Table 4 of 40 C.F.R. 63, Subpart FFFF. The control device requirements for the storage tanks are provided in 40 C.F.R. 63, Subpart SS, however, there is an exception in 40 C.F.R. §63.2470(c) that for control devices used to control emissions only from storage tanks, the operating limits, monitoring, and recording for process vents listing in 40 C.F.R. 63, Subpart SS shall be used instead of the procedures for storage tanks listed in §§63.985(c), 63.998(d)(2)(i), and 63.999(b)(2) of 40 C.F.R. 63, Subpart SS. The 40 C.F.R. 63, Subpart SS monitoring requirements provided in 40 C.F.R. §63.990(c)(3) for process vents are for regenerative carbon adsorbers. The carbon canisters used by DuPont on the Group 1 storage tanks are non regenerative and the monitoring parameters specified in 40 C.F.R. §63.990(c)(3) for carbon adsorbers does not apply. DuPont has not requested an alternative monitoring procedure, for the carbon canisters, therefore a compliance plan was added in Sections 4.6.1 and 4.6.2. DuPont will be required to submit the request for alternative monitoring for the Group 1 storage tanks A010.1S and A010.2S to U.S. EPA Region III no later than October 1, 2010. Within thirty days of EPA's decision on the alternative monitoring request, DuPont must submit an application for a significant modification to incorporate either the terms and conditions specified in the EPA alternative monitoring approval letter (if approved) or to incorporate the applicable requirements of 40 C.F.R. 63, Subpart FFFF (if denied).

The Methyl Methacrylate Tank #5 (A080.1S) has a capacity greater than 10,000 gallons, however, the maximum true vapor pressure of methyl methacrylate is not greater than 6.9 kilopascals if the temperature of the liquid in the tank is maintained below 28 °C. According to 40 C.F.R. §63.111, the maximum true vapor pressure is defined as the equilibrium partial pressure exerted by the total organic HAPs in the stored or transferred liquid at the temperature equal to the highest calendar-month average of the liquid storage or transfer temperature for liquids stored or transferred above or below the ambient temperature. Since this tank is refrigerated, the maximum true vapor pressure is calculated at the highest calendar-month average of the liquid storage and according to the amended NOCS Report, dated March 18, 2010, this tank must be refrigerated for continued safe operation and the temperature of this tank is maintained below 28 °C. Since the maximum true vapor pressure at this temperature is below 6.9 kilopascals, this tank is a Group 2 storage tank.

Transfer Racks

The NOCS did not identify any transfer racks (as defined in 40 C.F.R. §63.2550) in the Acrylic Resin Production Unit.

Equipment Leaks

Equipment in organic HAP service is subject to the requirements under 40 C.F.R. §63.2480 and Table 6 of 40 C.F.R. 63, Subpart FFFF. In organic HAP service is defined by 40 C.F.R. §63.2550 to mean a piece of equipment that either contains or contacts a fluid (liquid or gas) that is at least 5 percent by weight of total organic HAP. To demonstrate compliance with the requirements under 40 C.F.R. §63.2480 and Table 6 of 40 C.F.R. 63, Subpart FFFF, the permittee must comply with the requirements of either 40 C.F.R. 63, Subparts UU or H or 40 C.F.R. 65, Subpart F. In their NOCS Report, DuPont indicated that they will comply with the provisions of 40 C.F.R. 63, Subpart UU for Acrylic Resin Production.

Wastewater Streams

Wastewater is defined by 40 C.F.R. §63.2550 as water that is discarded from an MCPU or control device through a point of determination (POD) and that contains either: an annual average concentration of compounds in Tables 8 and 9 of 40 C.F.R. 63, Subpart F of at least 5 ppm_w and has an annual average flowrate of 0.02 liters per minute or greater; or an annual average concentration of compounds in Tables 8 and 9 to 40 C.F.R. 63, Subpart FFFF of at least 10,000 ppm_w at any flowrate. A Group 1 wastewater stream is a wastewater stream consisting of process wastewater at an existing or new source that meets the criteria for Group 1 status in 40 C.F.R. §63.2485(c) for compounds in Tables 8 and 9 of 40 C.F.R. 63, Subpart FFFF and/or a wastewater stream consisting of process wastewater at a new source that meets the criteria for Group 1 status in 40 C.F.R. §63.132(d) for compounds in Table 8 to 40 C.F.R. 63, Subpart G. A Group 2 wastewater stream is any process wastewater stream that does not meet the definition of a Group 1 wastewater stream. In their NOCS, DuPont stated that there were no Group 1 wastewater streams generated in the Acrylic Resin Production and that wastewater streams generated are Group 2.

Maintenance wastewater streams are subject to the requirements of 40 C.F.R. §63.105, except as specified in 40 C.F.R. §63.2485.

Heat Exchange Systems

In their NOCS, there were no heat exchange systems identified in the Acrylic Resin Production Area.

40 C.F.R. 64 - Compliance Assurance Monitoring (CAM)

According to 40 C.F.R. §64.2(a), CAM applies to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria: 1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 C.F.R. §64.2(b)(1); 2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and 3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. 40 C.F.R. §64.2(b)(1)(i) exempts emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act; and 40 C.F.R. §64.2(b)(1)(vi) exempts emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method.

DuPont Washington Works conducted a review of their applicability to 40 C.F.R. 64 – “Compliance Assurance Monitoring” (CAM) for the Acrylic Resin Production Area. Based on the information submitted, DuPont determined that none of the control devices are subject to CAM because, as demonstrated in the following table, they do not satisfy all of the criteria above required to be subject to CAM.

CAM Applicability for Acrylic Resin Production

Control Device	Is the unit subject to an emission limitation or standard other than one exempt under 40 C.F.R. §64.2(b)(1)? If yes, state pollutant(s).	Is the control device used to achieve compliance with such emission limitation or standard? If yes, state pollutant(s) controlled.	Does the unit have potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the amount for a source to be classified as a major source?	Subject to CAM?
A010C Carbon Adsorber	Yes – VOC, Ethyl Acrylate	Yes – VOC, Ethyl Acrylate	No	No
A260C Bag Filter	Yes – PM ₁₀	Yes – PM ₁₀	No	No
A350.1C Bag Filter	Yes – PM ₁₀ , VOC, Acrylic Acid, Ethyl Acrylate, Methanol, Methyl Methacrylate	Yes – PM ₁₀	No	No
A350.2C Bag Filter	Yes – PM ₁₀ , VOC, Acrylic Acid, Ethyl Acrylate, Methanol, Methyl Methacrylate	Yes – PM ₁₀	No	No
A390.1C/A390.2C Water Scrubber/Bag Filter	Yes – PM ₁₀ , VOC, Acrylic Acid, Ethyl Acrylate, Methanol, Methyl Methacrylate	Yes – PM ₁₀	No	No
A390.8C Bag Filter	Yes – PM ₁₀	Yes – PM ₁₀	No	No
A390.6C Bag Filter	No – inside vent, bag filter used for indoor fugitive dust control	NA	NA	No

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 for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.” There are no petroleum liquid storage tanks in the Acrylic Resin 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 Acrylic Resin 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 Acrylic Resin Production Area constructed after July 23, 1984 with a design capacity equal to or greater than 75 cubic meters (m³).

- d. 40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.” The Acrylic Resin 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 Acrylic Resin Production Area does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
- f. 40 C.F.R. 60, Subpart RRR - “Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.” The Acrylic Resin Production Area does not produce any of the chemicals listed in 40 C.F.R. §60.707 as a product, co-product, by-product, or intermediate.
- g. 40 C.F.R. 61, Subpart V - “National Emission Standards for Equipment Leaks (Fugitive Emissions Sources).” Applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in the Acrylic Resin Production Area.
- h. 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).
- i. 40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.” The Acrylic Resin Production Area does not produce the materials listed in 40 C.F.R. §63.1310.
- j. 40 C.F.R. 60, Subpart EEEE – “National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).” The Acrylic Resin Production Area does not distribute organic liquids as defined by 40 C.F.R. §63.2406.
- k. 40 C.F.R. 63, Subpart PPPP – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.” The Acrylic Resin Production Area does not produce as an intermediate or final product that meets the definition of “surface coated” plastic part.
- l. 40 C.F.R. 63, Subpart WWWW - “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” The Acrylic Resin 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.
- m. 40 C.F.R. 63, Subpart ZZZZ – “National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines.” The Acrylic Resin Production Area does not have a stationary Reciprocating Internal Combustion Engine (RICE) as defined by 40 C.F.R. §63.6675.
- n. 40 C.F.R. 63, Subpart DDDDD – “National Emission Standards for Hazardous Air Pollutants: Industrial/Commercial/Institutional Boilers and Process Heaters.” The Acrylic Resin Production Area does not own or operate an industrial, commercial, or institutional boiler or process heater as defined in 40 C.F.R. §63.7575 of the proposed rule.
- o. 40 C.F.R. 63, Subpart HHHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” The Acrylic Resin Production Area does not produce, blend, or manufacture coatings as part of the manufacturing process.

- 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 Acrylic Resin 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 Acrylic Resin 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 Acrylic Resin Production Area does not contain any fuel burning units.
- s. 45CSR10 - "To Prevent and Control Air Pollution from the Emission of Sulfur Oxides." The Acrylic Resin Production Area does not contain any fuel burning units subject to the sulfur dioxide weight emission standards of 45CSR§10-3. Also, per 45CSR§10-4.1.e, manufacturing process source operations in the Acrylic Resin Production Area are exempt from the sulfur dioxide concentration limits of 45CSR§10-4.1 because the potential to emit of sulfur dioxide is less than 500 pounds per year.
- t. 45CSR16 - "Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60." The Acrylic Resin Production Area is not subject to any requirements under 40 C.F.R. 60.
- u. 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 Acrylic Resin Production Area is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.

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: August 16, 2010
Ending Date: September 15, 2010

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 57th 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 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1226 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.