

Fact Sheet



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

Permit Number: **R30-03900001-2007 (1 of 5)**

Application Received: **March 27, 2007**

Plant Identification Number: **039-00001**

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

Facility Name: **Belle Plant**

Mailing Address: **901 West DuPont Avenue, Belle, WV 25015**

Physical Location:	Belle, Kanawha County, West Virginia
UTM Coordinates:	451.90 km Easting • 4232.60 km Northing • Zone 17
Directions:	Route 60 exit; right on DuPont Avenue; left at plant gate.

Facility Description

Waste Treatment Plant. The waste treatment plant operation consists of process and sanitary waste collection, equalization/isolation, neutralization, aeration, clarification, de-watering of waste sludge, lime stabilization and landfilling of de-watered sludge. Raw materials used at the Waste Treatment plant include 50% caustic, sulfuric acid, phosphoric acid, anti-foams, aqueous polymers and calcium oxide.

Boilers. Steam is generated by burning natural gas in four indirect-fired boilers generating 450 psig steam. A segment of the 450 psig steam is used by plant processes. The remaining is reduced to 150 psig and 10 psig steam. Water used to feed each boiler is conditioned at the Powerhouse Filtered Water Plant where water is filtered in the sand filters to remove sediment.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Criteria Pollutants	Potential Emissions	2005 Actual Emissions
Carbon Monoxide (CO)	358.90	132.39
Nitrogen Oxides (NO _x)	1196.34	441.32
Particulate Matter (PM ₁₀)	32.40	8.589
Total Particulate Matter (TSP)	32.40	8.589
Sulfur Dioxide (SO ₂)	2.56	0.946
Volatile Organic Compounds (VOC)	23.49	17.437
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2005 Actual Emissions
Total HAPs	12.97	8.483

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

Title V Program Applicability Basis

This facility has the potential to emit over 350 tpy of CO and over 1,100 tpy of NO_x. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, DuPont 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:	45CSR1	NO _x Budget Trading Program
	45CSR2	PM from combustion of fuel in indirect heat exchangers.
	45CSR6	Open burning prohibited.
	45CSR7	PM from manufacturing process operations.
	45CSR10	Control of sulfur oxide emissions.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Pre-construction permit.
	45CSR40	CAIR NO _x Ozone Season Trading Program
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. Part 97	Federal NO _x Budget Trading Program

State Only: 45CSR4 No objectionable odors.

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 (if any)
R13-1567A	09/06/2002	

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

The initial Title V permit was issued on September 24, 2002. There have been no modifications to the initial Title V permit and there have been no changes to R13-1567A since the issuance of the initial Title V permit. Although the Title V permit and R13-1567A have not been modified, the following changes have been addressed in this Title V Renewal permit:

The frequency of visible emissions checks for units 00P-03 and 00P-04 (subsection 4.2.3.) was reduced from weekly to monthly based on the fact that no visible emissions have been observed from this equipment for the duration of the initial permit.

The Powerhouse boilers were subject to the Boiler and Process Heater MACT, 40 C.F.R. 63, Subpart DDDDD; however, that rule has since been vacated. Because natural gas is the only fuel consumed, the only requirement of the rule, initial notification, had been met on March 10, 2005.

Non-Applicability Determinations

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

40 C.F.R. 60, Subpart D; Standards for Performance of Fossil-Fuel-Fired Steam Generators (for Which Construction is Commenced after August 17, 1971.) The Powerhouse boilers were constructed before August 17, 1971.

40 C.F.R. 60, Subpart Db; Standards for Performance of Fossil-Fuel-Fired Steam Generators (for Which Construction is Commenced after June 19, 1984.) The Powerhouse boilers were constructed before June 19, 1984.

40 C.F.R. 60, Subparts D, F, G and H. DuPont operates four HON MACT units on site. However, no stream defined or designated as Group 1 will be directed through the wastewater treatment plant before pretreatment.

40 C.F.R. 63, Subpart MMM. DuPont operates one unit designated under the Pesticide Active Ingredient MACT. No Group 1 wastewater streams will be sent to the wastewater treatment plant through the plant system.

40 C.F.R. 64 - Compliance Assurance Monitoring. A baghouse is mounted directly to the lime silo, allowing the pollutant collected to fall back into the silo. Additionally, potential pre-control device emissions of particulate matter is less than 100 tons per year. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.

45CSR§7-4.2. Mineral Acids. 45CSR§7-10.6 exempts sources of emissions that have less than one tenth of a pound per hour of mineral acids and an aggregate of less than one hundred pounds per year for all sources of mineral acids located at the stationary source. The phosphoric tank has the potential to emit 1.2 lb/yr, and is, therefore, considered insignificant.

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: September 24, 2007

Ending Date: October 24, 2007

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

Jay Fedczak, PE

Title V Program Manager

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

Jay Fedczak, PE

West Virginia Department of Environmental Protection

Division of Air Quality

601 57th Street SE

Charleston, WV 25304

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Response to Comments

No comments were received during the concurrent public comment and EPA review period. Therefore, no changes were made to the final permit.