

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on February 26, 2013.

Permit Number: **R30-03900001-2013 (1 of 5)**
Application Received: **April 29, 2014**
Plant Identification Number: **039-00001**
Permittee: **E. I. DuPont de Nemours & Company**
Facility Name: **Belle Plant**
Mailing Address: **901 West DuPont Avenue, Belle, WV 25015**

Permit Action Number: *MM01* Revised: *July 1, 2014*

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.

Fire Water Pumps. There are 2 diesel engines (575 HP and 800 HP) that are used in emergencies for the fire water pumps.

This modification is to add an existing gasoline storage tank (Emission Unit ID: GST) to this permit.

Emissions Summary

The Potential to Emit (PTE) for VOCs will increase by 0.12 TPY.

Title V Program Applicability Basis

This facility maintains the potential to emit over 100 tons per year of Carbon Monoxide, Nitrogen Oxides, and Volatile Organic Compounds. The facility also maintains the potential to emit over 10 tons per year of Methanol and over 25 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, E. I. DuPont de Nemours & Company's Belle Plant 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR§21-23 45CSR30	RACT requirements for VOC emissions. Operating permit requirement.
--------------------	------------------------	---

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the 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>)
R13-1567A	9/6/02	

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," which may be downloaded from DAQ's website.

Determinations and Justifications

With this modification, Section 7.0 was added for the gasoline storage tank (GST). This is an existing tank discovered during an audit performed by the permittee. According to 45CSR§21-23.1.c, tanks with a throughput of less than 10,000 gallons per month are subject only to the provisions of 45CSR§§23.2.a.1 and 23.3.

The following conditions were added to this permit:

- Condition 7.1.1 requires the gasoline tank to be loaded by submerged fill, as specified in 45CSR§21-23.2.a.1.
- Condition 7.2.1 requires verification of condition 7.1.1 upon inspection.
- Condition 7.4.1 requires daily records showing the quantity of all gasoline delivered to the site. These records are required to be retained for at least 3 years in a readily accessible location and shall be made available upon request, as specified in 45CSR§21-23.3.

Non-Applicability Determinations

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

None

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: N/A
Ending Date: N/A

Point of Contact

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

Rex Compston, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478
Rex.E.Compston@wv.gov

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.

Response to Comments (Statement of Basis)

Not applicable.