

Fact Sheet



For Proposed 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 April 21, 2009.

Permit Number: **R30-03900001-2009 (3 of 5)**
Application Received: **March 30, 2010**
Plant Identification Number: **03-54-039-00001**
Permittee: **E.I. DuPont de Nemours & Co., Inc.**
Facility Name: **Belle Plant**
Mailing Address: **901 W. DuPont Ave.**
Belle, WV 25015

Permit Action Number: *MM01* Revised: *Proposed*

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

Facility Description

Manufacture of various organic and agricultural chemicals. Production of Higher Monomers from Methyl Methacrylate; Methacrylic Acid from Acetone Cyanohydrin; regeneration of Sulfuric Acid; removal of inhibitor from Methyl Methacrylate.

Site - SIC codes: 2869; 2879; 2821

This modification was facilitated to comply with the Consent Decree (2:09-0385) resolving the case of *U.S. v. DuPont*.

Emissions Summary

The following Potential to Emit (PTE) changes are associated with this modification:

Determinations and Justifications

Paragraph 12 of the Consent Decree states: “Upon cessation of operation of the Facility, each Defendant shall surrender all air pollution permits for the Facility to the permitting authority in the State.” “the Facility” is defined in Paragraph 7.g of the Consent Order as “the sulphuric acid regeneration plant” at the Belle Site. The Belle Plant’s Title V Permit covers several other operating units in addition to the Sulfuric Acid Regeneration (SAR) plant. Therefore, DuPont cannot surrender the entire permit; instead, the permit is being edited to remove all provisions that authorize operation of the SAR plant. These provisions are as follows:

- All of Section 6.0, “Source Specific Requirements [SAR]”
- The portions of conditions 4.1.3 and 5.1.6 mentioning the SAR
- All SAR requirements in the Rule 10 Monitoring Plan (Appendix B)

All equipment listed under the SAR portion of Section 1.1, “Emission Units,” is being removed from this permit except for four storage tanks (Emission Units: ACR301, ACR303, ACR325, and ACR326). These tanks, while currently listed under the SAR, are not considered part of the SAR plant as defined in 40 CFR Part 60, Subpart H or Paragraph 7.g of the Consent Decree. Therefore, they are being moved to the Methacrylic Acid (MAA) operations section of Section 1.1.

Since operations of the SAR have permanently ceased, DuPont must decommission the SAR equipment and related equipment. DuPont states this decommissioning may take several months to complete. Also, during the decommissioning, there will potentially be incidental emissions of sulfur dioxide and sulfuric acid mist from working and breathing losses as DuPont transfers sulfuric acid and oleum from the storage tanks and SAR equipment. However, DuPont has stated these emissions will be insignificant, less than 1 lb/hr and 5 tons/year.

Conditions 3.5.3. and 3.5.5. were updated to include electronic submittal requirements of the annual compliance certification to the US EPA.

Non-Applicability Determinations

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

Not applicable.

Request for Variances or Alternatives

None.

Insignificant Activities

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

Comment Period

Not Applicable.

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

Rex Compston
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

Rex Compston
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

Response to Comments (Statement of Basis)

Not applicable.