

# Fact Sheet



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

Permit Number: **R30-03900001-2015 (4 of 5)**  
Application Received: **April 28, 2014**  
Plant Identification Number: **03900001**  
Permittee: **The Chemours Company FC, LLC**  
Facility Name: **Belle Plant**  
Mailing Address: **901 W. DuPont Ave.**  
**Belle, WV 25015**

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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.

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### Facility Description

Manufacturer of various organic chemicals. Production of "Vazo" and glycolic acid.  
SIC codes: 2869; 2879

### Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions (Group 4 Only)	2013 Actual Emissions (Facility Wide)
Carbon Monoxide (CO)	4.3	117.7
Nitrogen Oxides (NO <sub>x</sub> )	1.0	256.4
Particulate Matter (PM <sub>2.5</sub> )	0.78	2.8
Particulate Matter (PM <sub>10</sub> )	0.78	2.8

<b>Regulated Pollutants</b>	<b>Potential Emissions (Group 4 Only)</b>	<b>2013 Actual Emissions (Facility Wide)</b>
Total Particulate Matter (TSP)	1.08	9.3
Sulfur Dioxide (SO <sub>2</sub> )	<0.01	0.76
Volatile Organic Compounds (VOC)	5.0	650.8
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions (Group 4 Only)</b>	<b>2013 Actual Emissions (Facility Wide)</b>
Total HAP's	4.66	99.64

### Title V Program Applicability Basis

This facility has the potential to emit more than 393 TPY of CO, 1,228 TPY of NO<sub>x</sub>, and 663 TPY of VOC's. Due to this facility's potential to emit over 100 TPY of CO, NO<sub>x</sub>, and VOC's, as well as over 10 TPY of any single HAP and 25 TPY for total HAP's facility wide, Chemours 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6 45CSR7 45CSR10 45CSR11 45CSR13 WV Code § 22-5-4 (a) (14)  45CSR16 45CSR§21-5.9 45CSR30 45CSR34  40 C.F.R. Part 60 Kb 40 C.F.R. Part 60 NNN  40 C.F.R. Part 63 F, G, H 40 C.F.R. Part 63 MMM 40 C.F.R. Part 63 FFFF 40 C.F.R. Part 61 40 C.F.R. Part 82, Subpart F	Open burning prohibited. Particulate Matter emissions Sulfur Oxide Emissions* Standby plans for emergency episodes. Preconstruction permits for minor sources The Secretary can request any pertinent information such as annual emission inventory reporting. New Stationary Sources VOC Emissions Operating permit requirement. Permits for construction, modification, relocation, etc. Tanks Synthetic Organic Chemical Manufacturing Industry Distillation Operations* Hazardous Organic NESHAP* Pesticide Active Ingredient* Miscellaneous Organic NESHAP Asbestos inspection and removal Ozone depleting substances
State Only:	45CSR4 45CSR§21-40 45CSR27	No objectionable odors. VOC Emissions Toxic Air Pollutants
	* These requirements are applicable for the facility, but not for this Group.	

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> )
R13-1399A	12/10/2001	
R13-1534B	7/17/2007	
CO-R21-97-31	9/10/1997	
CO-R27-91-40A	11/14/1991	
CO-R27-92-45A(91)	5/27/1992	

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

This is a renewal of the Title V permit. The following changes have been made to the most recent version of this Permit:

#### General Changes

The address for EPA has been updated in Condition 3.5.3.

Citations for Rule 21 and 27 Consent Orders now include the citation (State Enforceable Only)

#### Vazo

Storage Tanks V113 and V020 are out of service and have been removed from the equipment table.

Tanks V027, V030, V031, V032 as well as Refrigeration Unit V028 and Extruder V029 are existing equipment that have been added to the Section 1.0 Emission Unit Table. They were previously combined with other units. Tanks V030 and V031 were previously included as part of the straight line filter system. They were associated with V018 (217.003). Extruder V029 was previously included as part of the dryer system. It was associated with V006 (213.006). Tank V032 was previously included as part of the filtrate stripping system. It was associated with V005 (217.003). Tank V027 was previously associated with the surfactant tank V008. The Refrigeration Unit V028 is associated with the entire process because it is used in several places to provide cooling. The only applicable requirements for any of the separated units is for the Refrigeration Unit V028, which is subject to 40CFR82, Subpart F.

Condition 4.2.8 previously contained a lower limit for density of 1.010 g/cc for the Halogenated Group 1 Scrubber (217.003) liquor. The lower limit was obtained through performance test data recorded in that range. The upper level of 1.015 g/cc corresponds to approximately 8% hydrochloric acid in water. A density value greater than 1.015 g/cc would show that the liquor in the scrubber is oversaturated and not meeting the efficiency requirements of Conditions 4.1.17 and 4.1.18. Since pure water (0% hydrochloric acid) has a density of approximately 0.98 g/cc, any density value below 1.015 g/cc would show that the scrubber is not oversaturated with hydrochloric acid, and therefore meeting the efficiency requirements of Conditions 4.1.17 and 4.1.18. Therefore Condition 4.2.8 has been changed to remove the 1.010 g/cc lower limit and only require a density of less than or equal to 1.015 g/cc.

The proposed determination method used for Emission Point ID 213 (Vazo 67) now includes footnote g (Chlorocarbon levels in Vazo process streams are determined by DuPont method No. V1500.165.BE).

Conditions 4.2.3 and 4.2.4 have been changed to require a visible emission condition correction within 24 hours instead of “a timely manner”.

The citation in Condition 4.2.3 now contains the authority 45CSR§30-5.1.c and the applicable emission unit 213.007.

The citation for Flare SB001 (121.001) has been removed from Condition 4.2.4 since it already has existing visual emission requirements in Condition 4.2.6.

#### Glycolic Acid

Storage Tank G029 is out of service and has been removed from the equipment table.

Heat Exchanger G031 which does not have a vent, was an existing part of the synthesis converter G030 (251.040). The facility has listed it separately and it has been added to the Section 1.0 Emission Unit Table. High pressure pump G008A has been split into Heat Exchanger G032 and High pressure pump G034. G008A has been removed from the equipment table and Heat Exchanger G032 and High pressure pump G034 have been added to the equipment table. Additionally, backup Heat Exchanger G033 and High Pressure Pump G035 which do not have vents, are newly installed and added to the equipment table. They are associated with the thermal oxidizer control device G040 (251.040). None of these units have applicable requirements.

At the time of Consent Order CO-R21-97-31, the facility had a formaldehyde plant on site with a flasher (440) and 5 formaldehyde storage tanks (252.004-252.008). The emission unit ID for the flasher has changed to G010 and is listed as a separator in the equipment table. There is only one formaldehyde tank at the facility now and the emission unit ID for it is G006. These emission units vent to the thermal oxidizer (G040) and have an emission point ID of 251.040. Conditions 5.1.3, 5.1.18, and 5.1.19 have been revised to reflect these changes.

Condition 5.1.7 now references Condition 5.1.23 instead of 5.1.21.

Previous Conditions 5.2.6 and 5.2.7 have been renumbered appropriately to 5.2.5 and 5.2.6.

The citation in Condition 5.2.4 now contains the authority 45CSR§30-5.1.c and the applicable emission unit 252.003.

Conditions 5.2.4 and 5.2.5 have been changed to require a visible emission condition correction within 24 hours instead of “a timely manner”.

The applicable emission unit in Condition 5.2.5 has been corrected from 251.40 to 251.040.

### **Non-Applicability Determinations**

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

#### **1. 40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM)**

This Group does not have a pollutant specific emissions unit (PSEU) for any pollutant meeting the applicability requirements of 40 C.F.R. §64.2 and therefore does not need to have submitted a CAM plan in accordance with the CAM rule.

This facility is not subject for the following reason:

40CFR§64.2(a)(3) – This Group does not have a PSEU with potential pre-control device emissions equal to or greater than 100 percent of the amount, in tons per year, of any pollutant that would require the facility to be classified as a major source.

### **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: January 15, 2015  
Ending Date: February 17, 2015

### **Point of Contact**

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

Mike Egnor  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478  
[michael.egnor@wv.gov](mailto:michael.egnor@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)**

R30-03900001-2009 Group 4 of 5 AA01 was issued (February 1, 2015) after this Permit went to Draft/Proposed. The Permittee name changed from “E.I. DuPont de Nemours and Company” to “The Chemours Company FC, LLC”. This change was incorporated into Pages 1 and 2 as well as the header of this Permit. This fact sheet now lists “The Chemours Company FC, LLC” as the Permittee Name.