

# Fact Sheet



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

Permit Number: **R30-03900001-2019 (3 of 5)**  
Application Received: **October 4, 2018**  
Plant Identification Number: **03-54-039-00001**  
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

Higher Monomers (HM) and MMA Stripping.

Site - SIC codes: 2869; 2879; 2821

### Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions (Group 3)	2018 Actual Emissions (Group 3)
Carbon Monoxide (CO)	0.0	0.0
Nitrogen Oxides (NO <sub>x</sub> )	0.0	0.0
Particulate Matter (PM <sub>2.5</sub> )	0.0	0.0
Particulate Matter (PM <sub>10</sub> )	0.0	0.0

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions (Group 3)</b>	<b>2018 Actual Emissions (Group 3)</b>
Total Particulate Matter (TSP)	0.0	0.0
Sulfur Dioxide (SO <sub>2</sub> )	0.0	0.0
Volatile Organic Compounds (VOC)	41.26	4.67
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions (Group 3)</b>	<b>2018 Actual Emissions (Group 3)</b>
Methyl Methacrylate	11.26	3.49
Total HAPs	20.26	4.62

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

This facility has the potential to emit equal to or greater than 100,000 tons per year of carbon dioxide equivalent (CO<sub>2</sub>e) and 100 tons per year of greenhouse gases (GHGs) on a mass basis.

### **Title V Program Applicability Basis**

This facility has the potential to emit over 100 tons per year of Carbon Monoxide, Nitrogen Oxides, and Volatile Organic Compounds. The facility also has 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, The Chemours Company FC, LLC'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.

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

Federal and State:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR16	New Stationary Sources
	45CSR30	Operating permit requirement
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. Part 60 Subpart Kb	Tanks

40 C.F.R. Part 60 Subpart NNN	Synthetic Organic Chemical Manufacturing Industry Distillation Operations
40 C.F.R. Part 61	Asbestos inspection and removal
40 C.F.R. Part 63 Subpart WW	National Emission Standards for Storage Vessels
40 C.F.R. Part 63 Subpart FFFF	Miscellaneous Organic NESHAP
40 C.F.R. Part 65 Subpart C	Storage Vessels

State Only:	45CSR4	No objectionable odors.
	45CSR§21-40	VOC Emissions

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 (if any)
R13-1002E	5/21/2019	
R13-1628A	7/17/2007	
R13-2742	4/1/2008	
CO-R21-97-31	9/6/1997	
CO-R21-C-2001-10A(97)	04/10/2001	

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**

This renewal Permit includes R30-03900001-2014 MM01 (Part 3 of 5). Since the most recent version of this permit, the following changes have been made:

As a result of R30-03900001-2014 MM01 (Part 3 of 5):

1. Updated "R13-1002D" to "R13-1002E" in the Section 1.2 active permits list.
2. Increased the Methyl Methacrylate emissions from "Shipping" in Condition 4.1.1 from 2.74 TPY to 11.00 TPY.
3. Increased the throughput rate of the MMA Refining Unit from 90 production units to 211 production units.

4. Deleted Condition 3.4.4 because this condition was not included in R13-1002E since the equipment regulated under that Permit do not have controls.

Other changes in this Permit include:

1. The US EPA and DAQ contact information has been updated in Conditions 3.5.3, 3.5.5, and 3.5.6.
2. In the Section 1.0 Equipment Table, the year installed date of ACR018 has been corrected from 2015 to 2014 and tank ACR022 was replaced in 2017 so its installation date was updated. There are no new applicable requirements as a result of this upgrade. The following Emission Units have been removed from the Section 1.0 Equipment table: ACR019, ACR020, ACR038, ACR039, ACR049, ACR050, and ACR051 have been removed from the facility; and Emission Units ACR029, ACR044, ACR045, ACR046, and ACR048 are officially out of service.
5. Since the CAIR Emission Unit (Boiler 10 – 00B-02) is solely contained in the R30-03900001-2018 Group 1 of 5 Permit, Condition 3.1.9 and Appendix A have been removed, and previous Conditions 3.1.10 and 3.1.11 have been renumbered accordingly.
6. The citation in Condition 3.4.4 has been changed from R13-1002 (Condition 3.4.2) to 45CSR§30-5.1.c as R13-1002E Condition 3.4.2 no longer references this Condition.
7. Condition 4.2.5 was based upon the requirements of the 1993 version of 40CFR§60.664. These requirements have been updated in 2011. Condition 4.2.5 has been updated to incorporate these changes.

#### **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)**

Chemours' Group 3 of 5 Permit 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) - The facility 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: August 14, 2019  
Ending Date: September 13, 2019

**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

**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.