

Air Permit Review

Permit Issue Date: DRAFT

Region: Fayetteville Regional Office
County: Bladen
NC Facility ID: 0900009
Inspector's Name: Tien Nguyen
Date of Last Inspection: 05/27/2010
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): DuPont Company - Fayetteville Works Facility Address: DuPont Company - Fayetteville Works 22828 NC Highway 87 West Fayetteville, NC 28302 SIC: 3081 / Unsupported Plastics Film And Sheet NAICS: 326113 / Unlaminated Plastics Film and Sheet (except Packaging) Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other: 15A NCAC 2D .1109 <i>[112(j) – Part 2 MACT Hammer for Boilers & Process Heaters]</i>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 0900009.09A Date Received: 09/10/2009 Application Type: 112(j) Part 2 Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 03735/T35 Existing Permit Issue Date: 02/22/2010 Existing Permit Expiration Date: 01/31/2015
Michael Johnson Environmental Manager (910) 678-1155 22828 NC Highway 87 West Fayetteville, NC 28306+7332	Karen Wrigley Plant Manager (910) 678-1546 22828 NC Highway 87 West Fayetteville, NC 28306+7332	Michael Johnson Environmental Manager (910) 678-1155 22828 NC Highway 87 West Fayetteville, NC 28306+7332	
Review Engineer: Kevin Godwin Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 03735/T36 Permit Issue Date: Permit Expiration Date: 01/31/2015	

I. Purpose of Application

DuPont Company – Fayetteville Works is located in Duart Township, Bladen County, North Carolina. Application No. 0900009.09A, received September 1, 2009, is a Part 2 MACT “Hammer” application for: two (2) No. 6, No. 2 fuel oil, and natural gas-fired boilers (**ID Nos. PS-A and PS-B**) rated at 139.4 million and 88.4 million British thermal units per hour (MMBtu/hr); and two (2) No. 2 fuel oil and natural gas-fired boilers (**ID Nos. PS-C and PS-Temp**) rated at 97 MMBtu/hr and between 30 and 100 MMBtu/hr.

II. Permit Modifications/Changes

The following table describes the modifications to the current permit.

Page(s)	Section	Description of Changes
1	Permit Cover Page	Amend permit revision numbers and issuance/effective dates and update to most recent shell version (v3.2.2).
3	Table of Emission Sources	Included Case-by-case MACT designation for sources ID Nos. PS-A, PS-B, PS-C, and PS-Temp .
12	2.1 A.6.	Included 112(j) Case-by-case MACT condition.

Page(s)	Section	Description of Changes
37	2.1 F.4.	Included 112(j) Case-by-case MACT condition.
47	3.0	Updated General Conditions to most recent shell version (v3.2.2).

III. Regulatory Review

- A. **15A NCAC 2D .1109 – CAA § 112(j); Case-by-Case MACT for Boilers & Process Heaters** – On July 20, 2007, the D.C. Circuit Court vacated the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, which had been promulgated under 40 CFR 63, Subpart DDDDD. The North Carolina Attorney General’s office has determined that the NESHAP vacatur equates to the failure of the U.S. EPA to promulgate a standard as required under Section 112(d) of the Clean Air Act (CAA). As a result, the site-specific Maximum Achievable Control Technology (MACT) standards required under CAA §112(j), commonly referred to as the MACT “hammer” provisions, have been triggered. North Carolina regulations implementing the MACT hammer are found at 15A NCAC 2D .1109.

NC DAQ has developed this guidance to provide standards and compliance procedures that it has determined meet the requirements of § 112(j) (<http://daq.state.nc.us/permits/112j/>). Standards were developed using procedures in § 112(d). This section provides that MACT standards are equivalent to the top 12% of performers in each subcategory, or in the alternative, the top 5 performers where there are less than 30 sources. NC DAQ utilized test data from North Carolina sources to establish the MACT standard. Further, a 99.9% confidence interval was applied to the average.

The NC DAQ received a Part 2 MACT “Hammer” application from this facility asking that the NC DAQ establish 112(j) emissions limitations in accordance with NC DAQ’s recommendations. The facility proposed to comply with the filterable particulate matter (PM), mercury (Hg), and carbon monoxide (CO) emission limitations that are consistent with the NC DAQ application guidance. NC DAQ has developed this guidance to provide standards and compliance procedures that it has determined meet the requirements of § 112(j). Filterable PM emission limitations are a surrogate for non-mercury metal hazardous air pollutants (HAP).

Emissions from these sources shall not exceed the emissions limitations listed below as a result of firing **Residual fuel oil**:

- i. Filterable PM: 0.45 lbs/mmBtu
- ii. Mercury (Hg): 2.0e-05 lbs/mmBtu
- iii. Carbon Monoxide (CO): 28 ppmvd, corrected to 7% oxygen

The initial compliance date for this facility is 3 years from the issuance of this permit. Presently, it is unknown if additional control or limitations will be necessary to demonstrate compliance.

To demonstrate compliance with the standards, the facility will be required to conduct an annual compliance test. In most cases, the compliance test will be a stack test. However, the Permittee may chose to conduct a fuel analysis to demonstrate compliance with the mercury limit. Also, if stack test results show that emissions from an affected source are less than 80% of any applicable emission limitation, the frequency of testing for that pollutant shall be reduced from once per year to once every five years.

III. Draft Permit Review Summary

Mr. Jim Moser of the Fayetteville Regional Office was provided a draft permit and draft permit review document on October 14, 2010.

Mr. Michael Johnson, Environmental Manager at DuPont Company – Fayetteville Works was provided a draft permit for review on October 14, 2010.

Ms. Katy Forney and Ms. Gracy DeNois (U.S. EPA, Region IV) were provided a draft permit for review on <DATE>.

IV. Recommendations

This permit modification application for the DuPont Company – Fayetteville Works facility located in Duart Township, Bladen County, North Carolina has been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ has determined that this facility appears to be complying with all applicable requirements.

Issue Permit No. 03735T36