



Moats, Nikki B <nikki.b.moats@wv.gov>

Discussion about Specialty's Title V Permit Update regarding your previous comments

4 messages

Moats, Nikki B <nikki.b.moats@wv.gov>

Mon, Dec 16, 2024 at 2:14 PM

To: "Whapham, Joseph" <whapham.joseph@epa.gov>

Hello Adam,

Do you have some time this week to briefly talk about the permit update that Specialty Products made to their Title V Permit over the comments we previously discussed?

Carrie and I wanted to run this by you to ensure it covered what you were looking for regarding your comments before we sent this out to the proposed comment period.

Thanks,
Nikki B. Moats

Whapham, Joseph <Whapham.Joseph@epa.gov>

Tue, Dec 17, 2024 at 2:39 PM

To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Hi, Nikki,

I am available on Friday from 10:00 to 2:00. I am working Monday if Friday does not work for you.

Thanks,
Adam

	J. Adam Whapham Environmental Engineer Region 3, Air Permits Branch US EPA Mid-Atlantic Region Phone 215-814-2160 Email whapham.joseph@epa.gov  
---	---

From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, December 16, 2024 2:15 PM
To: Whapham, Joseph <Whapham.Joseph@epa.gov>
Subject: Discussion about Specialty's Title V Permit Update regarding your previous comments

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[Quoted text hidden]

Moats, Nikki B <nikki.b.moats@wv.gov>
To: "Whapham, Joseph" <Whapham.Joseph@epa.gov>

Tue, Dec 17, 2024 at 2:44 PM

Adam,

I'm free for an hour at 11 on Friday, and then I'm on vacation for the next two weeks, so that would work best for me.

Thanks,
Nikki

[Quoted text hidden]

3 attachments



image001.jpg
8K



image002.png
2K



image003.png
3K

Whapham, Joseph <Whapham.Joseph@epa.gov>
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>
Cc: "McCumbers, Carrie" <carrie.mccumbers@wv.gov>

Fri, Dec 20, 2024 at 11:53 AM

Hi Nikki and Carrie,

Gwen and I both are fine with you sending the Specialty Product permit out for comments.

Happy Holiday's,

1/6/25, 2:30 PM

State of West Virginia Mail - Discussion about Specialty's Title V Permit Update regarding your previous comments

[Quoted text hidden]



Moats, Nikki B <nikki.b.moats@wv.gov>

Additional Title V Permit language - CTO

1 message

Cynthia Lester <cynthia.lester1@covestro.com>
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Thu, Nov 21, 2024 at 11:56 AM

Nikki,

Thank you for the information today. Per our conversation, below is some language to add regarding the venting of the CTO.

- The thermal oxidizer (Y-2124) shall not be vented to the atmosphere if the temperature falls below 1832F (1000C).

As I said during our conversation, please message the wording if needed. Thank you!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

[covestro.com](https://www.covestro.com)

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

501 Second Ave

South Charleston

West Virginia, 25303

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Moats, Nikki B <nikki.b.moats@wv.gov>

CTO info

4 messages

Cynthia Lester <cynthia.lester1@covestro.com>
To: "nikki.b.moats@wv.gov" <nikki.b.moats@wv.gov>

Thu, Nov 7, 2024 at 10:13 AM

Nikki,

This response is in reference to Section 4.1.5 in our Title V permit. (I thought bullet points might make it easier to understand).

- The temperature of the CTO for the initial testing was at 1075C.
 - The permit states that "the combustion chamber temperature shall not fall more than 167F (**75C**) below the temperature monitored during the most recent performance test..."
 - So the temperature cannot fall below **1000C** (1832F) (1075-75=1000C)
-
- The 3 hours was put in the initial permit in order to give the CTO time to get back up to temperature; however, if the temperature of the CTO falls below the 1000C mark, we do not/cannot vent to the CTO. The block valve stays closed (it is all interlocked in the DCS).

I hope this makes sense. Please let me know if you need more details or a better explanation. Thanks!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

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West Virginia, 25303

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Moats, Nikki B <nikki.b.moats@wv.gov>
To: Cynthia Lester <cynthia.lester1@covestro.com>

Thu, Nov 7, 2024 at 12:32 PM

Cindi,

Thanks for this info, it gave us what we needed to move forwards with 4.1.5. I can tell you about it over the phone if you'd like further information on what our plans are.

The last question we have is about condition 6.1.15.

According to a letter sent by John Legg to Bayer when R13-2561K was finished, there was supposed to be a performance test done to ensure that condition 6.1.11's parameters didn't need to be changed. We don't have any records in AX of this, and I was hoping that maybe you have records of that performance test, because we believe as long as it has been completed, we can look to remove condition 6.1.15 as a relic of an older permit.

This is the best way I could put this in an email, so if you want to talk about it some, please give me a call at 304-414-1282.

Thanks,
Nikki

[Quoted text hidden]

Cynthia Lester <cynthia.lester1@covestro.com>
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Thu, Nov 7, 2024 at 12:46 PM

Let me look a performance test for 6.1.15. I'll be in touch.

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

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From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Thursday, November 7, 2024 12:32 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: CTO info

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[Quoted text hidden]

Cynthia Lester <cynthia.lester1@covestro.com>
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Thu, Nov 7, 2024 at 1:24 PM

There was no performance testing done on the revised Wastewater Stripper (C-2044) because that "new" column was only in service from October 2015 to January 2016 before putting the original back in its place. The original is still in service as of today.

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

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Cynthia.Lester1@covestro.com

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From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Thursday, November 7, 2024 12:32 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: CTO info

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Cindi,

[Quoted text hidden]

[Quoted text hidden]

**Moats, Nikki B** <nikki.b.moats@wv.gov>

Info

1 message

Cynthia Lester <cynthia.lester1@covestro.com>
To: "nikki.b.moats@wv.gov" <nikki.b.moats@wv.gov>

Thu, Nov 7, 2024 at 9:39 AM

Nikki,

I have some info on the 167F and 3hour time limit if you have time to give me a call.

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

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**Moats, Nikki B** <nikki.b.moats@wv.gov>

Title V permit questions

2 messages

Cynthia Lester <cynthia.lester1@covestro.com>
To: "nikki.b.moats@wv.gov" <nikki.b.moats@wv.gov>

Wed, Nov 6, 2024 at 10:22 AM

Good morning.

I have researched and believe I've confirmed the information you've requested from our current Title V permit update.

- Section 4.1.5 – the performance testing for our Thermal oxidizer was conducted in April 1998, with the report being issued in July 1998. I believe the wording "...during the most recent performance test..." has been in the permit since 2000, which would make sense due to the fact the testing was conducted in 1998.
- Section 6.1.15 – C-2044 Wastewater stripper was reduced in size and redesigned in 2015 to be more efficient. Our production manager tracks the requirements in Section 6.1.11 monthly to ensure no changes are needed to the wastewater stripper.

Please let me know if there are any additional questions or information needed to confirm the EPA's requests. Thank you!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

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Cynthia Lester <cynthia.lester1@covestro.com>
To: "nikki.b.moats@wv.gov" <nikki.b.moats@wv.gov>

Wed, Nov 6, 2024 at 1:10 PM

Nikki,

I hope the attached answers the question about where the 1832 degrees F for the Thermal Oxidizer. This excerpt comes from the R13-1182B permit application (Process Description tab).

Let me know if I need to keep digging or if this is sufficient (for now).

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

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20241106125515.pdf
61K

**BAYER CORPORATION
POLYMER POLYOLS MANUFACTURING UNIT #4
REGULATORY SUMMARY**

New Source Performance Standards

- 1) Tanks C-109 and C-110 are required to meet New Source Performance Standards (NSPS). These tanks currently operate as a closed system that vents to a control device (thermal oxidizer) that has a removal efficiency greater than 95% as required by NSPS.

BAT

Our Regulation 27 Consent Order (CO-R27-92-22A(91)) requires that equipment and methods employed to reduce Toxic Air Pollutant emissions within the South Charleston plant meet BAT,

- 1) The planned modification to the No. 4 Polymer Polyol manufacturing unit (Process Area ID 605) will not result in any increased emissions from the thermal oxidizer that is the routine process vent. The planned modification will result in an increase in the potential to emit of acrylonitrile from jet vent E-658. This jet vent is only used (maximum of 720 hours/year) when the thermal oxidizer is shut down or malfunctioning and the conditions specified in R13-1182A are met. The jet condensing system meets the 98% reduction requirement for organic hazardous pollutants (40 CFR 63.113 Process Vent Provision – Reference Control Technology) for the HON In Subpart G.

The destruction efficiency for acrylonitrile and other HAP's have been demonstrated to be 99.9+% at operating temperatures greater than 1832°F and retention times more than 1.5 seconds. At the proposed waste gas flow rates to the thermal oxidizer we are operating at temperatures higher than 1832°F and retention times more than 1.5 seconds.

- 2) There are de minimus emissions of TAP's from several storage tank vents and Bayer Corp is requesting that controls for these vessels be exempted as allowed in 45 CSRR27 5.1. On a case-by-case basis, the director may exempt very small process or storage tanks or tanks storing material mixtures containing low mass fractions of toxic air pollutants from BAT requirements taking into consideration the actual level of emission control and/or the toxic air pollutant emission rate from the tank.

RACT

All of the emission points in this modification are previously shown in the Regulation 21 registration document and none of the emission points after the increase have the potential to emit less than 6 lbs/hr VOC's except for the jet vent. Maximum theoretical emissions of VOC's from emission point E-658 could exceed six pounds

Polymer Polyol #4 Permit Modification

9/14/00

Page 2

per hour, but this emission point meets BAT which would exceed the requirements for RACT.

9/14/00

JHWhite



Moats, Nikki B <nikki.b.moats@wv.gov>

Updated Pre-DRAFT Version of the Title V Permit for Covestro LLC, South Charleston Plant

3 messages

Moats, Nikki B <nikki.b.moats@wv.gov>

Wed, Oct 16, 2024 at 10:47 AM

To: "Supplee, Gwendolyn" <Supplee.Gwendolyn@epa.gov>, whapham.joseph@epa.gov

Cc: Carrie McCumbers <carrie.mccumbers@wv.gov>, Laura M Crowder <laura.m.crowder@wv.gov>

Hello Gwen,

I am sharing the attached most recent versions of the pre-draft permit and fact sheet for Covestro LLC's South Charleston Plant, R30-03900102-2024 for the purposes of engagement with EPA. Please let me know if you have any comments or questions.

Sincerely,

Nikki B. Moats (he/him/his)

WV Department of Environmental Protection

Division of Air Quality

Title V Permit Writer

304-414-1282

2 attachments

**DPPermit R30-03900102-2024.docx**

422K

**DPFactSheet R30-03900102-2024.doc**

124K

Moats, Nikki B <nikki.b.moats@wv.gov>

Mon, Dec 2, 2024 at 9:14 AM

To: "Supplee, Gwendolyn" <Supplee.Gwendolyn@epa.gov>, whapham.joseph@epa.gov

Cc: Carrie McCumbers <carrie.mccumbers@wv.gov>, Laura M Crowder <laura.m.crowder@wv.gov>

Hello Gwen,

Condition 4.1.5 has been revised to address the suggestions of USEPA and the updated version of the permit and fact sheet have been attached. Please let me know if you have any comments or questions.

Sincerely,

Nikki B. Moats (he/him/his)

WV Department of Environmental Protection

Division of Air Quality

Title V Permit Writer

304-414-1282

[Quoted text hidden]

2 attachments

**DPFactSheet R30-03900102-2024.doc**

124K

**DPPermit R30-03900102-2024.docx**

423K

Whapham, Joseph <Whapham.Joseph@epa.gov>

Fri, Jan 3, 2025 at 11:36 AM

To: "Moats, Nikki B" <nikki.b.moats@wv.gov>, "Supplee, Gwendolyn" <Supplee.Gwendolyn@epa.gov>

Cc: Carrie McCumbers <carrie.mccumbers@wv.gov>, Laura M Crowder <laura.m.crowder@wv.gov>

Hi Nikki,

Gwen and I both reviewed the Draft permit and think the language added to the permit covers what we were asking for. You can send the permit out for public comment.

Thank you,

Adam



From: Moats, Nikki B <nikki.b.moats@wv.gov>**Sent:** Monday, December 2, 2024 9:14 AM**To:** Supplee, Gwendolyn <Supplee.Gwendolyn@epa.gov>; Whapham, Joseph <Whapham.Joseph@epa.gov>**Cc:** Carrie McCumbers <carrie.mccumbers@wv.gov>; Laura M Crowder <laura.m.crowder@wv.gov>**Subject:** Re: Updated Pre-DRAFT Version of the Title V Permit for Covestro LLC, South Charleston Plant

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Moats, Nikki B <nikki.b.moats@wv.gov>

FW: WV DAQ Permit Application Status for Covestro LLC; South Charleston

1 message

Cynthia Lester <cynthia.lester1@covestro.com>
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>
Cc: Matthew Harris <matthew.harris@covestro.com>

Fri, Sep 20, 2024 at 7:55 AM

Nikki – fyi... our R13 Class I Administrative update has been assigned to Jonathan Carney.

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

[covestro.com](https://www.covestro.com)

E-mail

Cynthia.Lester1@covestro.com

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501 Second Ave

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West Virginia, 25303

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From: Barbara Buck <barbara.buck@covestro.com>
Sent: Thursday, September 19, 2024 2:58 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: FW: WV DAQ Permit Application Status for Covestro LLC; South Charleston

Best regards,

Barbara Buck

Site Manager, South Charleston WV

covestro.com

Covestro LLC

Telephone

COV-POA&PET-SCH-PET

+1 304 746 8012

501 Second Ave.

Mobile

South Charleston, WV, 25303, USA

+1 304 550 2742

barbara.buck@covestro.com

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From: Mink, Stephanie R <stephanie.r.mink@wv.gov>**Sent:** Thursday, September 19, 2024 2:55 PM**To:** Barbara Buck <barbara.buck@covestro.com>**Cc:** McKeone, Beverly D <beverly.d.mckeone@wv.gov>; Joseph R Kessler <joseph.r.kessler@wv.gov>; Jonathan W Carney <jonathan.w.carney@wv.gov>**Subject:** WV DAQ Permit Application Status for Covestro LLC; South Charleston

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Application Status**Covestro LLC; South Charleston****Facility ID No. 039-00102****Application No. R13-2561S**

Ms. Buck:

Your application for a Class I Administrative Update for the South Charleston facility was received by this division on September 19, 2024, and was assigned to Jonathan Carney.

Within 30 days, you should receive a letter from Jonathan Carney stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, Jonathan Carney, at 304-926-0499, extension 41247.

--

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V & NSR Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

**Moats, Nikki B** <nikki.b.moats@wv.gov>

FW: Covestro South Charleston (R13-2561R)

2 messages

Cynthia Lester <cynthia.lester1@covestro.com>
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>
Cc: Matthew Harris <matthew.harris@covestro.com>

Thu, Sep 19, 2024 at 8:15 AM

Nikki,

FYI... thank you for catching this! Let me know if you need additional information. Thanks!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

[covestro.com](https://www.covestro.com)

E-mail

Cynthia.Lester1@covestro.com

Covestro LLC

[501 Second Ave](#)

South Charleston

[West Virginia, 25303](#)**We are curious, courageous and colorful**

From: Cynthia Lester
Sent: Thursday, September 19, 2024 8:15 AM
To: DEPAirQualityPermitting@wv.gov
Subject: Covestro South Charleston (R13-2561R)

Please find attached a Class I Administrative Update request to revise Covestro South Charleston's current R13-2561R permit. Let me know if you need additional information. Thank you!

Cindi Lester, CSP

E&S Specialist



Office: 304-746-8046

Cell: 304-410-6416

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R13 Class I NSR Update Letter 09-19-2024.pdf
1355K

McCumbers, Carrie <carrie.mccumbers@wv.gov>
To: Nikki B Moats <Nikki.B.Moats@wv.gov>

Thu, Sep 19, 2024 at 3:24 PM

FYI

----- Forwarded message -----

From: **Air Quality Permitting, DEP** <depairqualitypermitting@wv.gov>

Date: Thu, Sep 19, 2024 at 1:36 PM

Subject: Fwd: Covestro South Charleston (R13-2561R)

To: Stephanie R Mink <stephanie.r.mink@wv.gov>

Cc: Jonathan W Carney <jonathan.w.carney@wv.gov>, Joseph R Kessler <joseph.r.kessler@wv.gov>, Carrie McCumbers <carrie.mccumbers@wv.gov>

Stephanie, please assign the attached as a Class I A/U - Permit Number R13-2561S, Covestro LLC (South Charleston, 039-00102), to Jon Carney.

No fee or public notice is required.

Carrie, as we discussed, these changes will need to be integrated into the Title V Renewal.

Thanks,

Joe

[Quoted text hidden]



R13 Class I NSR Update Letter 09-19-2024.pdf
1355K



Covestro LLC
501 Second Avenue
South Charleston, WV 25303

September 19, 2024

Email to DEPAirQualityPermitting@wv.gov

Ms. Laura M. Crowder, Director
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SW
Charleston, WV 25304

Subject: ***45CSR13 Permit
Class I Administrative Update Request
Covestro LLC, South Charleston, WV
R13-2561R***

Dear Ms. Crowder:

Please accept this letter as a formal request to revise our current R13-2561R permit with the following changes:

- Remove reference to T-9016 in the PO Distribution section (page 14 of 53).
- Remove reference to T-9017 in the PO Distribution section (page 15 of 53).

Suggested permit language for the above request. If there are any questions regarding the requested permit revisions, please call me at (304) 746-8012 or email barbara.buck@covestro.com.

Sincerely,

Barbara J. Buck
Vice President and Plant Manager

Attachments

West Virginia Department of Environmental Protection

*Harold D. Ward
Cabinet Secretary*

Class I Administrative Update



R13-2561R

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 CSR 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, Permission to Commence Construction, and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Covestro LLC
South Charleston Manufacturing Facility
039-00102

Laura M. Crowder

*Laura M. Crowder
Director, Division of Air Quality*

Laura M. Crowder

Digitally signed by: Laura M. Crowder
DN: CN = Laura M. Crowder email = Laura.M.Crowder@wv.gov, C = US O = WV Department of Environmental Protection
OU = Division of Air Quality
Date: 2024.04.18 09:19:38 -0400

Issued: April 18, 2024

Emissions Unit ID	Emission Point ID	Emissions Unit Description	Control Device
H-230	E-230	Evaporation Vacuum System	Atm Vent
T-13	E-13	Make Tank	Atm Vent
T-14	E-14	Make Tank	Atm Vent
C-5704	E-642	Refining System	Atm Vent
C-5706	E-645	Refining System	Atm Vent
H-267	E-267	Evaporation Vacuum System	Atm Vent
T-15	E-15	Make Tank	Atm Vent
T-16	E-16	Make Tank	Atm Vent
C-5804	E-5804	Refining System	Atm Vent
C-5806	E-5806	Refining System	Atm Vent
B196 Final Storage Tanks			
T-60	E-60	Product Storage	Atm Vent
T-61	E-61	Product Storage	Atm Vent
T-62	E-62	Product Storage	Atm Vent
T-63	E-63	Product Storage	Atm Vent
T-64	E-64	Product Storage	Atm Vent
T-65	E-65	Product Storage	Atm Vent
T-66	E-66	Product Storage	Atm Vent
T-67	E-67	Product Storage	Atm Vent
T-68	E-68	Product Storage	Atm Vent
T-698	E-698	Final Product Storage	Atm Vent
T-6798	E-6798	Product Storage	Atm Vent
Distillation Column			
C-5812	E-639	Distillation Column System	Atm Vent (Condenser)
PO Distribution			
C-2090	None	Carbon Treater (Normal Operation)	None
C-2090	E-26 & E-27	Carbon Treater (Activation/Deactivation) Vents to Boiler	DOW Boiler 26 or 27
C-2090B	None	Carbon Treater (Normal Operation)	None
C-2090B	E-26 & E-27	Carbon Treater (Activation/Deactivation) Vents to Boiler	DOW Boiler 26 or 27
C-101	N/A	PO Storage (South Sphere)	Vapor Balanced
C-102	N/A	PO Storage (North Sphere)	Vapor Balanced
T-9016	N/A	PO Storage (North Charleston Tank Farm)	Vapor Balanced

Remove

Emissions Unit ID	Emission Point ID	Emissions Unit Description	Control Device
T-9017	N/A	PO Storage (North Charleston Tank Farm)	Vapor Balanced

Remove

Emission Unit ID	Emission Point ID	Emission Unit Description	Control Device
EO Distribution			
C-7000 ⁽¹⁾	Fugitive	EO Storage Tank	Vapor Balanced
Y-7101 ⁽¹⁾	E-7101	EO Scrubber	Y-7101
D-7102 ⁽¹⁾	E-7101	EO Reaction Tank	Y-7101
D-7103 ⁽¹⁾	E-7101	EO Reaction Tank	Y-7101
C-7203 ⁽¹⁾	E-7203	Chiller Tank	None
V-7200 ⁽¹⁾	None	Chiller	None
(1) Equipment not installed.			

**Moats, Nikki B** <nikki.b.moats@wv.gov>

Po Storage Tanks

1 message

Matthew Harris <matthew.harris@covestro.com>
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Tue, Sep 17, 2024 at 2:13 PM

Hey Nikki,

The Covestro PO storage tanks are C-101 and C-102. The 16 and 17 Tanks are not ours.

Thank You,

Matthew Harris, Manager, HSEQ South Charleston WV



Phone: 304-746-8010

Cell: 304-444-6197

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Matthew.Harris@covestro.com

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Moats, Nikki B <nikki.b.moats@wv.gov>

Pre-DRAFT Version of the Title V Permit for Covestro LLC, South Charleston Plant

McCumbers, Carrie <carrie.mccumbers@wv.gov>

Mon, May 6, 2024 at 2:11 PM

To: "Supplee, Gwendolyn" <Supplee.Gwendolyn@epa.gov>

Cc: Nikki B Moats <Nikki.B.Moats@wv.gov>, "Whapham, Joseph" <Whapham.Joseph@epa.gov>, Laura M Crowder <laura.m.crowder@wv.gov>, "Egnor, Michael" <michael.egnor@wv.gov>

Hi Gwen,

Attached are the latest versions of the pre-draft permit and fact sheet for Covestro LLC's South Charleston Plant, R30-03900102-2024. The minor NSR permit incorporating terms from their consent order was recently issued and these changes have been incorporated into the pre-draft permit. I have attached marked up versions of both the permit and fact sheet showing the changes. Please let me know if you have any comments or questions.

Thanks,
Carrie

[Quoted text hidden]

2 attachments **Pre-Draft Fact Sheet to EPA 5 6 2024.docx**
81K **Pre-Draft Permit to EPA 5 6 2024.docx**
423K



Moats, Nikki B <nikki.b.moats@wv.gov>

Pre-DRAFT Version of the Title V Permit for Covestro LLC, South Charleston Plant

1 message

McCumbers, Carrie <carrie.mccumbers@wv.gov>
To: "Supplee, Gwendolyn" <supplee.gwendolyn@epa.gov>
Cc: Nikki B Moats <Nikki.B.Moats@wv.gov>

Wed, Oct 18, 2023 at 11:02 AM

Hi Gwen,

Attached is the pre-DRAFT version of the Title V Permit for Covestro LLC's South Charleston Plant, R30-03900102-2023. I have also attached a pre-DRAFT Fact Sheet. I would like for you to review these pre-DRAFT documents and provide comments and suggestions prior to DAQ sending the Draft Title V Permit out for public comment.

Thanks,
Carrie

2 attachments

Pre-DraftFactSheet R30-03900102-2023.doc
125K



Pre-DraftPermit R30-03900102-2023.docx
421K



Moats, Nikki B <nikki.b.moats@wv.gov>

40CFR63.1430

1 message

Cynthia Lester <cynthia.lester1@covestro.com>

Thu, Sep 14, 2023 at 11:26 AM

To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Nikki,

I looked into whether Covestro is subject to 40 CFR 63.1430(b)(2)(iii) and we are not. Please let me know if you have any other questions.

Thanks again!

Cindi Lester, CSP

E&S Specialist



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Cell: 304-410-6416

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Moats, Nikki B <nikki.b.moats@wv.gov>

FW: Title V Permit status update (rev.2)

1 message

Cynthia Lester <cynthia.lester1@covestro.com>
To: "Moats, Nikki B" <nikki.b.moats@wv.gov>

Thu, Aug 24, 2023 at 2:14 PM

Nikki,

See my comments/questions in **red font** in your email below.

Thank you and the DEP staff for ensuring our permit is accurate! We really do appreciate the work you guys are doing to help us.

Cindi Lester, CSP

E&S Specialist



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From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Wednesday, August 23, 2023 4:44 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

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Cindi,

After getting some time to meet with my supervisor and give the entire permit, fact sheet, and application one last once-over, there is one more section that we have noticed in the application that will need to be updated.

In the Control Devices section, a form for D-2124A was included; however, according to Attachment A of the permit, this device has been removed from service. **The D-2124A control device is still in service. I'm not sure what Attachment A you are referring to, as my Attachment A of the permit application is an Area Map. Please advise.**

I tried to give you a call, but our meeting was relatively late in the day. If you want to talk about this over the phone, please just let me know.

All of the control devices are using Continuous Monitoring as their CAM non-applicability determination; however, that determination is no longer accepted by the EPA on anything that isn't specifically using Continuous Emission Monitoring Systems (CEMS). We also noticed that for Y-2124, it does not trigger major source thresholds before controls (according to the information in the current Title V Application), which is what would trigger CAM. **I need to ask for clarification on this point. For all of our control devices, we follow the requirements listed in our permit and submit periodic/annual reports as required.**

- **Since the CAM non-applicability determination no longer being accepted by the EPA mean I need to remove that from our Permit (see the 2nd attachment)?**
- **Will this require any additional requirements from us? We monitor these as required and would report if we have a permit exceedance.**

EX-2424 and H-2443 have non-applicability determinations from the previous permit that still are applicable to be used now, they would just need to be changed in the application to match what is in the previous version of the permit. **I have revised the CFR reference on the APCD form (attached). I believe this is what you are referring to. If not, let me know.**

My supervisor had the following comment about CAM applicability that might help figure with the non-applicability determinations as well.

In order for CAM to apply, the unit has to be subject to an emission limitation or standard, the unit uses a control device to achieve compliance with any such emission limitation or standard, and the unit has to have pre-control device emissions of that applicable air pollutant which are major source.

As before, you can simply send these to me in pdf form, and I can have our secretary upload them to the application file.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 11:01 AM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

No worries. Attached is revised Section 2 of the permit application.

Cindi Lester, CSP

E&S Specialist



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Cell: 304-410-6416

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From: Moats, Nikki B <nikki.b.moats@wv.gov>

Sent: Wednesday, August 16, 2023 10:25 AM

To: Cynthia Lester <cynthia.lester1@covestro.com>

Subject: Re: Title V Permit status update

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Cindi,

I completely forgot a word when I was typing the original request. I meant section 2 of the permit application. That's my fault, my apologies.

-

Nikki

On Wed, Aug 16, 2023 at 9:50 AM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Per your request. Please let me know if you need anything else.

Cindi Lester, CSP

E&S Specialist



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From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Wednesday, August 16, 2023 8:45 AM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

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One more question,

Can you scan and send me a pdf of the following for the Title V application form:

In Section 2 of the permit, update the active R13 permit to 2561O

An Update for Section 3.0 of Title V Application form. Since there was a reduction in EtO emissions in Section 11.1.1, the EtO PTE likely has changed, so having the facility wide PTE updated and in our Application forms is necessary.

In attachment E forms that were updated, the emission limits were updated, but the conditions referenced need to be updated to 2561O instead of M.

Thanks,

Nikki

On Wed, Aug 16, 2023 at 8:06 AM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Good morning.

There are no changes to the PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, or Xylene.

Cindi Lester, CSP

E&S Specialist



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From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Wednesday, August 16, 2023 7:28 AM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

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Cindi,

I need some additional information regarding the permit.

In the SLEIS data and/or in the former permit's fact sheet, there was PTE for Acrylic Acid, Propionaldehyde, Propylene Oxide, Styrene, and Xylene.

Would the PTE numbers from these have changed from the previous permit's fact sheet, and if so, what are the new numbers?

Thanks,

Nikki

On Tue, Aug 15, 2023 at 2:20 PM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Correct. There is no CBI contained within the updates. Thank you!

Cindi Lester, CSP

E&S Specialist



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From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Tuesday, August 15, 2023 2:12 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

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Cindi,

I was just wanting to double check and confirm that there is no confidential information in the updates that were provided before we scanned them into our system and added them into the application file.

Thanks,

Nikki

On Mon, Aug 14, 2023 at 2:44 PM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Will do!

Cindi Lester, CSP

E&S Specialist



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From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Monday, August 14, 2023 2:43 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

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Cindi,

Thanks for the heads up, just let the person at the front desk know that it is for the Division of Air Quality and someone will pick it up. Most people that are in the office physically are almost done for the day, so that will make sure that it gets to the right place.

On Mon, Aug 14, 2023 at 2:38 PM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Nikki,

I am bringing the letter/attachments up today. I will ask the front desk to let Stephanie Mink know it's there. Please let me know if you have any questions or need further information.

Cindi Lester, CSP

E&S Specialist



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From: Moats, Nikki B <nikki.b.moats@wv.gov>
Sent: Tuesday, August 8, 2023 2:15 PM
To: Cynthia Lester <cynthia.lester1@covestro.com>
Subject: Re: Title V Permit status update

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Cindi,

As long as there is no CBI involved in the changes, you could also send them in via email. Any CBI being submitted would need to follow the guidelines in 45CSR31. If you're hand delivering it to the front desk, just tell them to let Stephanie Mink know that it has been delivered, and then we'll get it taken care of as quickly as possible from there.

Thanks,

Nikki

On Tue, Aug 8, 2023 at 12:28 PM Cynthia Lester <cynthia.lester1@covestro.com> wrote:

Nikki,

I just spoke with Matt and he said you were wanting a status update of our Title V Permit Application. I apologize for not sending you one sooner. I've reviewed our permit application page by page and I'm hoping to have you the updated forms and cover letter explaining the changes by the end of this week. I will let you know when it's ready and bring it to your office.

Thank you!

Cindi Lester, CSP

E&S Specialist



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2 attachments



Attachment G - Ex-2424 and H-2443 Revised.pdf
399K



20230824140403.pdf
461K