



# COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE

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## STATEMENT OF LEGAL AND FACTUAL BASIS

Chemours James River Plant  
1201 Bellwood Road, Richmond, VA

Permit No. PRO-50554

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, The Chemours Company, F.C., L.L.C. has applied for a renewal Title V Operating Permit for its Chemours James River Plant facility. The Department has reviewed the application and has prepared a draft renewal Title V Operating Permit.

Engineer/Permit Contact:

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Date: April 25, 2016

Air Permit Manager:

James E. Kyle, P.E.

Date: 4/25/2016

Deputy Regional Director:

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Date: 4/28/16

## **FACILITY INFORMATION**

### **Permittee**

The Chemours Company, F.C., L.L.C.  
1007 Market St.  
Wilmington, DE 19898

### **Facility**

Chemours James River Plant  
1201 Bellwood Road  
North Chesterfield, VA 23237

**County-Plant Identification Number:** 51-041-0078

**SOURCE DESCRIPTION:** NAICS Codes: 325222 – Noncellulosic Organic Fiber Manufacturing and 325211 – Plastic Material and Resin Manufacturing.

The James River Sulfuric Acid Plant (Unit 001) (SAP) produces various grades of fuming and non-fuming sulfuric acid for sale to external customers. Another grade of sulfuric acid produced by the plant, designated PS3, is piped to the DuPont Spruance Plant (permitted under Registration # 50397). The basic components of the sulfuric acid production process include the blower/turbine, dry tower, sulfur burner, A-boiler, converter, B-boiler, super-heater, economizer, heat exchanger, oleum tower, interpass absorbing tower, final absorbing tower, demister, and stack. All of these components are considered to be a single emissions unit.

A #2 fuel oil-fired emergency boiler (Unit 003) is used only when cold-starting the sulfuric acid process after a periodic maintenance shut-down, during an emergency shut-down to maintain the molten state of the sulfur, or for readiness testing.

## **PERMIT STATUS**

The facility is a Title V and PSD major source of sulfur dioxide. This source is located in an attainment area for all pollutants. The James River facility is currently permitted under a Title V operating permit modified on July 1, 2015 and a modified minor new source review permit issued on March 29, 2007 for the SAP. An application for the renewal of the Title V permit was received on August 18, 2015.

## **COMPLIANCE STATUS**

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, have been evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time. On November 6, 2007, DuPont entered into a Consent Decree with the Environmental Protection Agency (EPA) and several states, including the Commonwealth of Virginia. The facility is currently in compliance with the sulfur dioxide and sulfuric acid mist emission limits established by the Consent Decree and NSPS, 40 CFR 60, Subpart H, Standards of Performance for Sulfuric Acid Plants. As of this date, DuPont has completed all its obligations in the Consent Decree, which still has an active status.

**EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION**

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
<b>Sulfuric Acid Production Process</b>							
001	S002	Plant reconstructed in 2008-2009 and consists of sulfur burner; heat recovery boilers & related boiler system equipment; sulfur feed pit and related equipment; oleum tower & oleum cooler, drying tower cooler, interpass absorbing tower, final absorbing tower, acid cooler, main blower /turbine	18.75 tons sulfuric acid/hr	FAT Mist Eliminator	D01	Sulfuric Acid Mist	March 29, 2007
			38.3 MMBTU/hr (Sulfur Burner)	Dual Absorption	D002	Sulfur Dioxide	
<b>Emergency Boiler</b>							
003	S03	#2 fuel oil-fired emergency boiler	7.9 MMBTU/hr	-----	-----	-----	-----

\*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

**EMISSIONS INVENTORY**

Emissions are summarized in the following table.

<i>2014 PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR]</i>	
<b>CRITERIA POLLUTANTS</b>	<b>2014 ACTUAL EMISSIONS</b>
Particulate Matter (PM10)	9.7
Particulate Matter (PM2.5)	1.3
Particulate Matter (PM)	1.3
Sulfuric Acid Mist (H <sub>2</sub> SO <sub>4</sub> )	10.7
Lead (Pb)	2.0 x 10 <sup>-6</sup>
Nitrogen Oxides (NO <sub>x</sub> )	5.0
Sulfur Dioxide (SO <sub>2</sub> )	50.6
Carbon Monoxide (CO)	0.02
Volatile Organic Compounds (VOC)	0.001

**Emission Unit Applicable Requirements - Sulfuric Acid Production Process Unit 001**

The Title V emission requirements are based on the following: the minor NSR permit issued on March 29, 2007; 40 CFR Part 60 Subpart H, Standards of Performance for Sulfuric Acid Plants; 40 CFR Part 68 Subpart G, Chemical Accident Prevention Provisions Risk Management Plan; and 9 VAC 5-80-50 *et seq.*, Part II-Article 1 Federal Operating Permit for Stationary Sources.

**Limitations**

The March 29, 2007 minor NSR permit conditions 2, 5, 7, 8.b, and 12 are included in the Title V permit and are described below. The condition numbers referenced below refer to the TV permit.

- Because the recordkeeping conditions 13 a-c require records of “100% *equivalent* sulfuric acid produced” and correspond with the limitation conditions 1, 3.a, 3.b, and 3.d, the limitation conditions were updated to include “equivalent” to clarify what the correct units are and to make the requirements consistent.
- Condition 1 includes a throughput limitation.
- Condition 2 limits visible emissions. (NSPS Subpart H)
- Condition 3 limits PM/PM-10/H<sub>2</sub>SO<sub>4</sub>, SO<sub>2</sub>, and NO<sub>x</sub> hourly and annual emissions. Language was added to clarify that the emission rates in the emissions table do not apply to hourly limits during start-up and malfunction, but, rather the emission limits in Conditions 3.d and 3.e do. The asterisk that is associated with the sulfuric acid mist lb/hr limit in the minor NSR was removed since the 3-hr rolling average does not apply to this limit.
- Condition 3.a includes a SO<sub>2</sub> lb/ton emission limitation. (BACT)
- Condition 3.b includes a H<sub>2</sub>SO<sub>4</sub> lb/ton emission limitation. The permittee currently demonstrates compliance based on a one hour average. (NSPS Subpart H and BACT)
- Condition 3.c includes a SO<sub>2</sub> ppm emission limitation. (BACT)
- Condition 3.d includes a SO<sub>2</sub> lb/ton emission limitation. Compliance demonstration is based

on a 3-hr rolling average as indicated by the 2007 Consent Decree and has been incorporated in the permit accordingly. (BACT)

- Condition 5 requires PM and H<sub>2</sub>SO<sub>4</sub> emissions be controlled by a mist eliminator. This condition was in the May 10, 2011 Title V permit. This condition is based on the equipment list Condition 2 of the NSR permit. Because the NSR condition cites the BACT regulation it implies that the control was established and required by BACT therefore, it has been incorporated in the Title V permit accordingly. (BACT)
- Condition 6 requires SO<sub>2</sub> emissions be controlled by dual absorption. This condition has been added to the Title V. This condition is based on the equipment list Condition 2 of the NSR permit. Because the NSR condition cites the BACT regulation it implies that the control was established and required by BACT therefore, it has been incorporated in the Title V permit accordingly. (BACT)
- Condition 7 requires the facility to operate in compliance with NSPS Subparts A and H. The condition was updated to include “ton of” to be consistent with the NSPS. Subpart A was incorporated in the condition to include the requirement of 25.f of the November 6, 2007 Consent Decree.

The following conditions of the Title V permit were incorporated to include the requirements of 12.b and 25.e, of the November 6, 2007 Consent Decree.

- Condition 3.e, limits emissions during malfunction periods.
- Condition 4 specifies emission limitations that cannot be relaxed.

#### **Monitoring, Testing, Recordkeeping, and Reporting**

Conditions 13, 15.f, 15.h, 17 and 19 of the Title V permit were included to meet Part 70 periodic monitoring requirements.

- Condition 13 requires a differential pressure device on the mist eliminator.
- Condition 15.f requires recordkeeping to demonstrate compliance with SO<sub>2</sub> emission limits.
- Condition 15.h requires records from the differential pressure monitoring device on the mist eliminator.
- Condition 17 requires performance tests to demonstrate compliance with H<sub>2</sub>SO<sub>4</sub> emission limits.
- Condition 19 requires the permittee to report the results of any Method 9 evaluation, including the duration and severity of the opacity exceedance.

Conditions 9, 10, 12 and 15.e of the Title V permit were incorporated to include the requirements of 19.a.ii., 19.b, 19.c, and 19.d, of the November 6, 2007 Consent Decree.

- Conditions 9 and 10 include CEMS operation requirements.
- Condition 12 requires compliance with the approved CEMS plan for Unit 001.
- Condition 15.e requires the total mass of SO<sub>2</sub> emitted from Unit 001 be determined and recorded.

Condition 20 of the Title V permit requires the submittal of an updated Risk Management Plan. (40 CFR Part 68)

#### March 29, 2007 minor NSR permit

The monitoring, testing, notification and recordkeeping requirements in Conditions 9.b, 8.b and 10 of the NSR permit have been examined and unless indicated otherwise, have been determined to meet Part 70 periodic monitoring requirements as is. These requirements have been included as Conditions 8, 14 and 15 a-d, g, i, j and k of the proposed TV permit. The condition numbers referenced below refer to the TV permit.

- Condition 8 requires a continuous emission monitoring system (CEMS) for SO<sub>2</sub> emissions. The condition was updated to incorporate the requirements of 19, 19.a.i, and 19.a.iii, of the November 6, 2007 Consent Decree.
- Condition 14 requires weekly visible emission observations of the sulfuric acid production process stacks, corrective action to any unit where any visible emissions are observed, and associated recordkeeping.
- Condition 15 requires recordkeeping of throughputs, emission observations and monitoring data.

#### 40 CFR Part 60 Subpart H

By definition, Part 60 NSPS standards are presumed to include sufficient monitoring, recordkeeping and reporting (MRR) requirements to satisfy both periodic monitoring and CAM requirements. The MRR requirements of Subpart H have been included as Conditions 8, 11, 14, 15, 16 and 18 of the Title V permit. Condition 11 includes monitoring data procedures. Condition 16 includes testing requirements. Condition 18 requires semi-annual excess emission and monitoring performance reporting. The remaining conditions were discussed above.

#### **Compliance Assurance Monitoring (CAM)**

Because the uncontrolled SO<sub>2</sub> emissions are above major thresholds, the permit contains SO<sub>2</sub> emission limits, and dual absorption is used to control the SO<sub>2</sub> emissions the CAM requirements of 40 CFR 64 apply to emission unit 001 for SO<sub>2</sub> emissions. However, the SO<sub>2</sub> emissions are monitored by a CEMS which meet the requirements of CAM. The PM, PM-10, sulfuric acid mist, and NO<sub>x</sub> emissions are not subject to CAM because the emission unit 001 does not have the potential to emit above major thresholds.

#### **Streamlined/Obsolete Requirements**

- The NSR Permit Phase I section of Condition 2, Condition 4, the first sentence of Condition 5, Conditions 6, 8a, and 9a have not been included in the Title V permit because they are obsolete since Phase 2 has been completed and has replaced the requirements of Phase 1.
- The reference to performance specification 3 has been removed from Condition 8 of the Title V permit. Specification 3 is for O<sub>2</sub> and CO<sub>2</sub> CEMS which are not applicable to the facility. There is no basis for this specification and it is not an enforceable requirement it was removed.
- Condition 11 of the NSR permit included initial notification requirements which have been fulfilled therefore, the condition has been omitted from the Title V permit.
- The streamlined opacity and emission limits [from 9 VAC 5 Chapter 40-Part II-Article 1 Existing Stationary Sources Standards of Performance for Visible Emissions and Fugitive Dust/Emissions (Rule 4-1) and 9 VAC 5 Chapter 40 Part II – Article 21 Existing Stationary

Source Emission Standards for Sulfuric Acid Production Units (Rule 4-21) were less strict than those that remain in force.

- Conditions 13 through 20 of the NSR Permit have not been listed because they are the same as the requirements in the General Conditions section.

### **EMISSION UNIT APPLICABLE REQUIREMENTS - Emergency Boiler (Unit 003)**

The Emergency Boiler (Unit 003) is operated to prevent molten sulfur being fed to the sulfuric acid production process from solidifying in process pipes when the process is shut down or during an emergency such as a broken pipe. The unit is also operated occasionally to ensure it will be functional in an emergency event. The 7.9 MMBtu/hr distillate oil-fired emergency boiler was deemed exempt from minor NSR permitting in a letter dated December 15, 2006 and is subject to 9 VAC 5 Chapter 40-Part II-Article 8 Existing Stationary Sources Emission Standards for Fuel Burning Equipment (Rule 4-8). It is not subject to any NSPS and is an affected existing source for 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (MACT, Subpart JJJJJJ). The boiler area MACT was promulgated on February 21, 2011 and Virginia is not currently delegated to enforce it. Because it is a distillate oil burning boiler and subject to a MACT, it is specifically exempt from the state toxics rule, 9 VAC 5 Chapter 60-Part II-Article 5 Emission Standards for Toxic Pollutants from New and Modified Sources (Rule 6-5).

**Limitations** - The condition numbers referenced below refer to the TV permit.

- Condition 21 limits PM to 0.6 lb PM/MMBtu, which equates to 4.7 lb PM/hr (0.6 lb/MMBtu x 9.7 MMBtu/hr) based on Rule 4-8 of State Regulations.
- Condition 22 limits SO<sub>2</sub> emissions to 2.64 lb SO<sub>2</sub>/MMBtu, which equates to 20.9 lb SO<sub>2</sub>/hr (2.64 lb/MMBtu x 9.7 MMBtu/hr), based Rule 4-8 of State Regulations.
- Condition 23 limits visible emissions to 20% opacity. In the absence of an applicable NSPS, it is subject to 9 VAC 5 Chapter 50-Part II-Article 1 New and Modified Stationary Sources Standards of Performance for Visible Emissions and Fugitive Dust/Emissions (Rule 5-1).
- Condition 24 incorporates the limitations requirements of MACT Subpart JJJJJJ.
- Condition 25 limits the annual capacity factor of the boiler. (MACT Subpart JJJJJJ)

### **Periodic Monitoring, Recordkeeping, and Reporting**

*The EPA periodic monitoring guidance, dated September 18, 1998, indicates on page 4 that periodic monitoring is required for each emission point at a source, subject to Title V of the Act that is subject to an applicable requirement. With respect to these requirements, periodic monitoring is required for SO<sub>2</sub> and PM emissions as well as opacity from the Emergency Boiler (003). Virginia Regulations require that operators of exempt equipment keep records demonstrating that the equipment continues to be operated in a manner that maintains its exempt status.*

- In the absence of any specific or enforceable monitoring requirements for opacity in the existing or new source rules of Virginia's regulations (Rules 4-1 and 5-1), the opacity requirements for the Emergency Boiler (003) will be monitored by an opacity observation schedule as described in Condition 26 of the Title V permit. The monthly schedule is based upon the distillate fuel oil it uses, as verified by fuel certifications, and the infrequency of its operation.

- Conditions 27 and 28 of the Title V permit describe periodic monitoring for the Emergency Boiler (003) regarding the applicable PM and sulfur dioxide emission standards. Periodic monitoring has been determined to consist of obtaining fuel supplier certifications, records demonstrating compliance with sulfur limits, good operating practices, and adhering to a maintenance schedule, all of which are described in the State Regulations.
- Condition 24 of the Title V permit includes the monitoring, recordkeeping, and reporting requirements of MACT Subpart JJJJJJ.
- Condition 29 of the Title V permit requires the source to report the results of any Method 9 evaluation, including the duration and severity of the opacity exceedance, from 9 VAC 5-80-110 of State Regulations.

### **Compliance Assurance Monitoring (CAM)**

*The Emergency Boiler (003) does not have the potential to emit more than 100 tons per year of any criteria pollutant with or without control devices, thus it is not subject to CAM.*

### **Obsolete Requirements**

The fuel specification condition for the emergency boiler was removed since it is not an applicable requirement as defined by 9 VAC 5-80-60.

The condition that limited the sulfur content of the fuel oil for the emergency boiler was removed because it is not an applicable requirement as defined by 9 VAC 5-80-60.

The condition that required proper operation of the emergency boiler to minimize emissions that was based on the State Regulations for existing sources was removed since the work practice and management standards of MACT Subpart JJJJJJ apply to the unit and are considered more stringent.

The initial notification condition required by MACT Subpart JJJJJJ was removed since the requirement has been completed.

The notification of compliance condition required by MACT Subpart JJJJJJ was removed since the requirement has been completed.

### **FACILITY WIDE CONDITIONS**

#### **Testing**

Condition 3 of the NSR permit (Condition 30 of the Title V permit) and 9 VAC 5-50-30 requires the facility to be constructed to allow for emissions testing.

Condition 31 of the Title V permit requires the use of appropriate and approved test methods if testing is conducted. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

**INSIGNIFICANT EMISSION UNITS**

- Condition 32 of the Title V Permit lists the insignificant emission units identified at this facility. The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
1003	Gasoline Storage Tank	5-80-720 B.2.	VOC	1,000 gallons
1006	Product Truck & Rail Loading	5-80-720 B.1	PM, Sulfuric Acid Mist	200 gpm
1007	Unloading Molten Sulfur Pit	5-80-720 B.1	PM, hydrogen sulfide	-----
1008	Process Feed Molten Sulfur Pit	5-80-720 B.1	PM, hydrogen sulfide	-----
1010	#2 Fuel Oil Storage Tank	5-80-720 B.2	VOC	6,200 gallons

The citation criteria for insignificant activities are as follows:

- 9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
- 9 VAC 5-80-720 B - Insignificant due to emission levels
- 9 VAC 5-80-720 C - Insignificant due to size or production rate

**INAPPLICABLE REQUIREMENTS**

Condition 33 of the Title V permit lists reasons that some of the source types are not subject to applicable requirements that would appear to be applicable. The following are the requirements that have been determined to be inapplicable:

- 40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial Commercial Institutional Steam Generating Units.
- 40 CFR 60 Subpart Kb, Volatile Organic Liquid Storage Vessels Standards.
- 40 CFR 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.
- 40 CFR 64, Compliance Assurance Monitoring.
- 40 CFR 51, 52, 70, and 71, Title V Greenhouse Gas Tailoring Rule, Phase 1.
- 9 VAC 5 Chapter 40 Part II – Article 21, Existing Stationary Source Standards of Performance for Visible Emissions and Fugitive Dust/Emissions.
- 9 VAC 5 Chapter 60 Part II – Article 5, Emission Standards for Toxic Pollutants from New and Modified sources.

## GENERAL CONDITIONS

*The permit contains general conditions (#34-61) required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.*

### Comments on General Conditions

#### 35. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

This general condition cites the Articles that follow:

Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9 VAC 5-80-80. Application  
9 VAC 5-80-140. Permit Shield  
9 VAC 5-80-150. Action on Permit Applications

#### 39. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

In order for emission units to be relieved from the requirement to make a written report in 14 days the emission units must have continuous monitors meeting the requirements of 9 VAC 5-50-410 or 9 VAC 5-40-41.

This general condition cites the sections that follow, as applicable to the facility:

9 VAC 5-40-41. Emissions Monitoring Procedures for Existing Sources  
9 VAC 5-40-50. Notification, Records and Reporting  
9 VAC 5-50-50. Notification, Records and Reporting

This general condition contains a citation from the Code of Federal Regulations as follows:

40 CFR 60.13 (h). Monitoring Requirements.

**43. Permit Modification**

This general condition cites the sections that follow:

- 9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
- 9 VAC 5-80-190. Changes to Permits.
- 9 VAC 5-80-260. Enforcement.
- 9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
- 9 VAC 5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
- 9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

**54. Malfunction as an Affirmative Defense**

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition 44 and General Condition 55. For further explanation see the comments on General Condition 55.

This general condition cites the sections that follow:

- 9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction
- 9 VAC 5-80-110. Permit Content

**58. Asbestos Requirements**

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains citations from the Code of Federal Regulations as follows:

- 40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.
- 40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.
- 40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

- 9 VAC 5-60-70. Designated Emissions Standards
- 9 VAC 5-80-110. Permit Content

**STATE ONLY APPLICABLE REQUIREMENTS – None identified**

**FUTURE APPLICABLE REQUIREMENTS - None identified**

**CONFIDENTIAL INFORMATION**

The permittee did not submit a request for confidentiality. All portions of the Title V application are available for public review.

**PUBLIC PARTICIPATION**

The proposed permit was placed on public notice in the Style Weekly from March 9, 2016 to April 8, 2016. The permit was concurrently reviewed by EPA. On April 6, 2016, comments were received from EPA. All comments were addressed. No additional comments were received during the Public Comment period.