

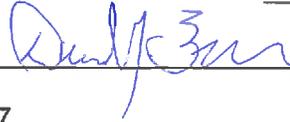
# MEMO

To: File – 20304 #28

From: Paul R. Jenkins, Air Permit Writer



APM: David J. Brown



Date: January 25, 2017

Re: Celanese Acetate, LLC – 20304 - Administrative Permit Amendment to the Title V Permit

**County-Plant Identification Number: 51-071-00004**

The Blue Ridge Regional Office (BRRO) received a permit application on January 6, 2017 that was dated January 3, 2017 for an administrative permit amendment to the Celanese Acetate, LLC (Celanese) Title V permit with the effective date of June 30, 2003 and expiration date of June 30, 2008<sup>1</sup>; amended on January 27, 2012.

This administrative permit amendment will incorporate the changes made to the State Operating Permit (SOP) that is undergoing an administrative amendment concurrently with this permit action. The administrative amendment to the SOP was undertaken to remove an incorrect reference to a scrubber. The BRRO agrees that the changes listed below can be made and meet the requirements for an administrative permit amendment according to 9VAC5-80-200.

The following changes were made to the permit:

- a. Page 4 The contact person was changed to the current contact – Andrew Hetz.
- b. Pages 6 – 15 Table of Contents – references to the SOP were changed to reflect the current amendment date.
- c. Pages 10 – 11 The Emission Unit ID (1ARSC004S1) for the Building 10 Vat Yard was added to the Emission Unit ID column. Under the columns titled “Pollution Control Device (PCD) Description” and “PCD ID” reference to the Bldg. 10 Vat Yard Scrubber - PCD ID 1ARSC004C1 was removed and replaced with “None”.
- d. Pages 16 – 56 The permit citations were updated to reflect the current amendment date for the SOP.
- e. Page 31 Added the Emission Unit ID (1ARSC004S1) to Condition VI.A.13. This change was included in the SOP.
- f. Page 32 Removed the reference to the “scrubber” and corrected the Emission Unit ID in Condition VI.C.1. These changes were included in the SOP.
- g. Pages 62 - 72 The General Conditions were updated to reflect current regulations and procedures.

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<sup>1</sup> Celanese Acetate, LLC submitted a timely and complete application for a Title V Permit renewal therefore the source is operating under an application shield according to 9 VAC 5-80-80 F.5 and 9 VAC 5-80-140.