SEP 11 2014

AIR PERMIT ROUTING/APPROVAL SLIP-Permits

62

AI No.	38806	Company	E I DuPont de Nemours & Co Inc	Date Received	7/18/14
Activity No.	PER20140003	Facility	E I DuPont de Nemours & Co - Chloroprene	Permit Type	TV-MOD
CDS No.	2580-00041	Permit No.	3000-V5	Expedited Permit	☐ yes ☒ no

1. Technical Review	Approved	Date rec'd	Date FW	Comments
Permit Writer LND	CND	7/22/14	7/28/14	
Air Quality / Modeling				
Toxics				
Technical Advisor	Dan		7/30/14	
Supervisor	RJT		8/5/14	otc as noted
Other				

2. Management Review (if PN req'd)	Approved	Date rec'd	Date FW	Comments
Supervisor				
Manager				
Assistant Secretary (PN)				

3. Response to Comments (if PN req'd)	Approved	Date rec'd	Date FW	Comments
Supervisor				
Manager				
Administrator				
Legal (BFD)				

4. Final Approval	Approved	Date rec'd	Date FW	Comments
Supervisor				
Manager	DVC		9/9/14	
Administrator				
Assistant Secretary	TB		9/9/14	

1. Technical Review

PN of App needed	☐ yes ☑ no	Date of PN of App		Newspaper	
Fee paid	☑ yes ☐ no				
NSPS applies	☐ yes ☑ no	PSD/NNSR applies	☐ yes ☑ no	NESHAP applies	☑ yes ☐ no

2. Post-Technical Review

Company technical review	☑ yes ☐ no ☐ n/a	E-mail date	8/13/14	Remarks received	☐ yes ☑ no 8/13/14 submitted add. changes
Surveillance technical review	☑ yes ☐ no ☐ n/a	E-mail date	8/13/14	Remarks received	☐ yes ☑ no

3. Public Notice

Public Notice Required	☐ yes ☑ no				
Library					
PN newspaper 1/City	*The Advocate*/Baton Rouge	PN Date		EDMS Verification	☐ yes ☐ no
PN newspaper 2/City		PN Date			☐ yes ☐ no
Company notification letter sent	Date mailed				
EPA PN notification e-mail sent	Date e-mailed				
OES PN mailout	Date				

4. Final Review

Public comments received	☐ yes ☐ no	EPA comments rec'd	☐ yes ☐ no	Date EPA Resp. to Comments-mailed	
Company comments received	☐ yes ☐ no	PN info entered into Permit Sec VI	☐ yes ☐ no	Date EPA approved permit	
Comments	on 8/13/14 Facility submitted additional changes (w/ Technical rev. comments) left out of original App. No comments were received. LND				

form_7193_r02
02/25/09

BOBBY JINDAL
GOVERNOR

PEGGY M. HATCH
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY

ENVIRONMENTAL SERVICES

Certified Mail No. 7013 1090 0002 2905 6454

Activity No.: PER20140003
Agency Interest No. 38806

Mr. Walter L. Glenn
Plant Manager
E. I. DuPont de Nemours & Co. - Pontchartrain Works
586 Highway 44
Laplace, LA 70068

RE: Part 70 Operating Permit Modification
Chloroprene Unit - E. I. DuPont de Nemours & Co. - Pontchartrain Works
Laplace, St. John the Baptist Parish, Louisiana

Dear Mr. Glenn:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 26 of April, 2017, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this 9 day of September, 2014.

Permit No.: 3000-V5
Sincerely,

Tegan B. Treadaway

Tegan B. Treadaway
Assistant Secretary

TBT:LND
c: EPA Region VI

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Chloroprene Unit
Agency Interest No.: 38806
E. I. DuPont de Nemours & Co. - Pontchartrain Works
Laplace, St. John the Baptist Parish, Louisiana

I. Background

Prior to February 1, 2012, DuPont Performance Elastomers, L.L.C. (DPE) owned and operated a chemical manufacturing facility near LaPlace, Louisiana. The facility is located on a portion of the Pontchartrain Site of E.I. DuPont de Nemours and Company (DuPont), on land that was leased to DPE by DuPont.

Effective February 1, 2012, DuPont Performance Elastomers, L.L.C. (DPE) was dissolved and all of its assets were transferred to E. I. DuPont de Nemours and Company (DuPont). A Notification of Change Form (NOC-1) for ownership change and fee were submitted to the LDEQ on January 30, 2012.

The DPE assets consisted of three (3) operating units now owned and operated by DuPont: They are as follows: the Neoprene Unit, the Chloroprene Unit, and the HCl Recovery Unit. The Neoprene Unit is authorized to operate under Air Permit No. 2249-V7 issued on May 15, 2014; the HCl Recovery Unit is authorized to operate under Air Permit No. 206-V2 issued on March 14, 2011; the Chloroprene Unit is authorized to operate under Air Permit No. 3000-V4 issued on April 26, 2012.

This is a minor modification to the Part 70 operating permit for the Chloroprene Unit.

II. Origin

A permit application and Emission Inventory Questionnaire dated July 15, 2014 were submitted by DuPont requesting a Part 70 operating permit modification. Additional information dated August 25, 2014 was also submitted.

III. Description

The DuPont Chloroprene Unit is a Synthetic Organic Chemical Manufacturing Industry (SOCMI) facility. Chloroprene (2-chloro-1,3-butadiene) is produced primarily as a raw material for the Neoprene Manufacturing Process. Chloroprene (CD) is manufactured by using four major steps:

1. DCB Synthesis – In the first step, Dichlorobutene (DCB) is manufactured in a liquid phase by ionic chlorination of butadiene in an evaporative cooled isothermal reactor. Crude DCB is a mixture of two isomers: 1,4 and 3,4-DCB.

2. DCB Refining – In the second step, the Crude DCB product is refined in a series of distillation columns. In the refining process, two DCB isomers (1,4-DCB and 3,4-DCB) are separated.
3. DCB Isomerization – In this step, the 1,4-DCB is isomerized to 3,4-DCB which is the desired raw material for the next and final monomer step.
4. CD Synthesis – In the last step, the refined 3,4-DCB is reacted with caustic, water, and a catalyst. The mixture is fed to a reactor to produce chloroprene.

Following a series of strippers and decanters, refined chloroprene is stored for use as the raw material in the manufacture of neoprene.

ACR Manufacture

The manufacture of crude ACR (2,3-dichloro, 1,3-butadiene) is performed in the Chloroprene Unit area. Crude ACR is sent, via pipeline, to the Neoprene Unit for refining and to be used in the manufacture of certain types of neoprene products and blends. The starting raw material for ACR production is trans-1,4-dichloro-2-butene (t-1,4-DCB) as produced in the existing DCB synthesis step.

Prevention of Significant Deterioration (PSD)

The DuPont facility is classified as an existing major source located in St. John the Baptist Parish, a parish in attainment with all New Source Review (NSR) regulated pollutants. The proposed permit does not include a major modification as defined in LAC 33:III.509.B. Therefore, PSD review is not required.

Non-Attainment New Source Review (NNSR)

The DuPont facility is located in St. John the Baptist Parish which is designated as an attainment area for all NSR regulated pollutants. Therefore, NNSR is not required.

With this modification, DuPont is proposing the following.

- To update General Condition XVII activity allowing the unit to remove solids from storage tanks from 50 days/yr to 80 days/yr and increase organic emissions from 0.025 TPY to 4.0 TPY.
- To update the fugitive emissions requirements under this permit by incorporating the fugitive emissions consolidation program previously approved in November 2013 for all the manufacturing units at this site.

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Chloroprene Unit
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E. I. DuPont de Nemours & Co. - Pontchartrain Works
Laplace, St. John the Baptist Parish, Louisiana

Proposed Emissions

Estimated emissions in tons per year for the Chloroprene Unit are as follows:

Pollutant	Before	After	Change
PM_{10}	0.22	0.22	-
$PM_{2.5}$			
SO_2	0.01	0.01	-
NO_X	2.97	2.97	-
CO	1.75	1.75	-
VOC *	102.66	102.66	-

*VOC TAP Speciation (TPY) LAC 33:III.Chapter 51 Regulated VOC TAPs			
Pollutant	**Before**	**After**	**Change**
Benzene	< 0.01	< 0.01	-
1,3-Butadiene[1]	10.16	10.16	-
Chloroprene	29.85	29.85	-
Cumene	< 0.001	< 0.001	-
Formaldehyde	< 0.01	< 0.01	-
Glycol Ethers (Table 51.3)	0.03	0.03	-
Toluene	2.08	2.08	-
Triethylamine	0.13	0.13	-
Total VOC TAPs	**42.27**	**42.27**	-

Other VOC	60.39

[1] Highly Reactive Volatile Organic Compound (HRVOC)

Non-VOC TAP Speciation (TPY) LAC 33:III.Chapter 51 Regulated Non-VOC TAPS			
Pollutant	**Before**	**After**	**Change**
Chlorine	0.10	0.10	-
Hydrochloric Acid	3.98	3.98	-
Total Non-VOC TAPs	**4.08**	**4.08**	-

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Chloroprene Unit
Agency Interest No.: 38806
E. I. DuPont de Nemours & Co. - Pontchartrain Works
Laplace, St. John the Baptist Parish, Louisiana

V. Type of Review

This permit was reviewed for compliance with 40 CFR Part 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) and Non-Attainment New Source Review (NNSR) regulations do not apply.

The DUPONT site is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. The Chloroprene Unit emits chloroprene and 1,3-butadiene (Class II TAPs) and chlorine and hydrochloric acid (Class III TAPs) at rates above their respective minimum emission rate (MER) established in LAC 33:III.5112. Sources emitting chloroprene and 1,3-butadiene require maximum achievable control technology (MACT); MACT is not required for Class III or Supplemental TAPs, but compliance with all applicable provisions of LAC 33:III.Chapter 51 is required. The impact of all TAP emissions must be below their respective Ambient Air Standards.

VI. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VII. Public Notice

Public Notice is not required to permit a minor modification.

VIII. Effects on Ambient Air

Emissions associated with the proposed modification were reviewed by LDEQ to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

IX. General Condition XVII Activities

		Emission Rates - tons				
Work Activity	**Schedule**	**PM_{10}**	**SO_2**	**NO_X**	**CO**	**VOC**
Routine Maintenance Activities	150 hours/year	-	-	-	-	2.00
Solid Deposit Removal from Tanks	80 days/year	-	-	-	-	4.0
Outage of Refrigeration Units*	50 hours/year	-	-	-	-	0.12
Source 1140-20 – Aqueous Storage Vent Condenser*	100 hours/year	-	-	-	-	0.15
Source 1110-2A – DCB Storage Tanks' Condenser*	50 hours/year	-	-	-	-	0.02
Source 1110-4B – Catalyst Sludge Receiver*	50 hours/year	-	-	-	-	0.02
Source 1117-1 – DCB Storage Tanks' Vent*	50 hours/year	-	-	-	-	0.17
ACR Equipment Clearing	Every 3 weeks	-	-	-	-	0.10
Decanter Cleaning	Once every 6 months	-	-	-	-	0.01
Vessel Cleaning	Once every 6 months	-	-	-	-	0.145
Maintenance on 1110-26 Scrubber	200 hours/year	-	-	-	-	0.11
ACR Transfer Tank vent during scrubber maintenance	432 hrs/yr	-	-	-	-	0.20

* Maintenance Activity

XI. Insignificant Activities

Description	Max Rate (TPY) or Tank Capacity (gallons)	Citation
NMP/Actrene Tote	350 gals	LAC 33:III.501.B.5.A.3
Laboratory Hoods	-	LAC 33:III.501.B.5.A.6
1110 Building Soap Tanks	560 & 280 gals	LAC 33:III.501.B.5.A.10
Isom Building Soap Tank	560 gals	LAC 33:III.501.B.5.A.10
1192 Soap Tanks (2)	560 gals each	LAC 33:III.501.B.5.A.10
Caustic Storage Tanks (2)	350,000 gals each	LAC 33:III.501.B.5.B.40
1110-25C NMP/PTZ Tote	300 gals	LAC 33:III.501.B.5.A.3
1110-25D Recovery Column Heels Tote	300 gals	LAC 33:III.501.B.5.A.3

Chloroprene Unit
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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter or Section												
		5▲	9	11	13	15	2103	2113	2115	2121	29*	51*	56	59*
UNF003	Chloroprene Unit	1	1	1	1			1			1	1	1	1
EQT003	**1110-1B** Inhibitor Make-up & Feed Tanks						3							
EQT004	1110-1B.1 Inhibitor Make-up Tank						3							
EQT005	1110-1B.2 Inhibitor Feed Tank						3							
EQT006	**1110-2** Refining Jets Vent System	1							2					
EQT007	1110-2.1 JVC Effluent Tank						3							
EQT008	1110-2.2 Pentane Column								2					
EQT009	1110-2.3 Heads Column								2					
EQT010	1110-2.4 Topper Column								2					
EQT011	1110-2.5 Refiner Column								2					
EQT012	1110-2.6 Recovery Column								2					
EQT013	**1110-2A** DCB Storage Tanks Condenser	1					3							
EQT014	1110-2A.1 DCB Storage Tank No. 1						3							
EQT015	1110-2A.2 DCB Storage Tank No. 2						3							
EQT016	**1110-2B** Emergency Inhibitor Make-up Tank						3							
EQT017	**1110-3** Isom Reactor Vent System	1							2					
EQT018	1110-3A Isom JVC Effluent Tank						3							
EQT019	1110-3B TEA Storage Tank						3							
EQT020	1110-3C TEA Burette						3							
EQT021	1110-3D Catalyst Mix Tank						3							
EQT022	1110-3E Catalyst Feed Tank						3							
EQT023	1110-3F Isom Purge Tank						3							
EQT024	1110-3H Isom Distillation Column								2					
EQT025	1110-3I Isom Reactors								2					

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter or Section												
		5▲	9	11	13	15	2103	2113	2115	2121	29*	51*	56	59*
EQT026	**1110-4** CD Vent Condenser	1							2					
EQT027	**1110-4B** Catalyst Sludge Receiver						3					1		
EQT028	**1110-5B** Emergency Inhibitor Feed Tank						3							
EQT029	**1110-9** Toluene Storage Tank						3							
EQT030	**1110-10** Reaction Modifier Totes						3							
EQT031	**1110-11** Reboiler Antifoulant Totes						3							
FUG002	**1110-22** ACR Process - Fugitive Emissions									3				
EQT098	**1110-25** PTZ/NMP Tanks						3							
EQT099	1110-25A PTZ/NMP Make-up Tank						3							
EQT100	1110-25A.1 PTZ/NMP Make-up Tank				1		3							
EQT101	1110-25B PTZ/NMP Storage Tank						3							
EQT114	**1110-26** ACR Process Vent								2					
EQT102	1110-26A DCB Chlorinator								2					
EQT103	1110-26B Vacuum Pump													
EQT104	1110-26C MD Condenser								2					
EQT105	1110-26D MD Separator								2					
EQT106	1110-26E MD Bubble Column								2					
EQT107	1110-26F MD Pre-reactor								2					
EQT108	1110-26G ACR Chlorinator Separator								2					
EQT109	1110-26H ACR Chlorinator								2					
EQT110	1110-26I MD Heels Decanter						3							
EQT111	1110-26J Crude ACR Decanter						3							
EQT112	1110-26K Decanter Standpipe						3							
EQT113	1110-26L Chlorinated ACR Transfer Tank						3							

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter or Section												
		5▲	9	11	13	15	2103	2113	2115	2121	29*	51*	56	59*
EQT228	1110-26M ACR/Water Decanter						3							
EQT046	**1117-1** DCB Storage Tanks Vent	1					3							
EQT047	1117-1A West Crude Tank						3							
EQT048	1117-1B East Crude Tank						3							
EQT049	1117-1C 1,4-DCB Tank						3							
EQT050	1117-1D Swing Tank						3							
EQT051	1117-1E HCl Feed Tank						3							
EQT052	1117-1F Waste Organic Tank						3							
EQT053	1117-1G t-1,4-DCB Feed Tank						3							
EQT227	1117-1H Recovery Tails Tank						3							
EQT054	**1117-2** Cellosolve Storage Tank						3							
EQT055	**1117-3** CD Catalyst Tank						3							
EQT059	**1140-20** Aqueous Storage Vent Condenser	1							2					
EQT060	1140-20A Diversion Tank						3							
EQT061	1140-20B Aq. Clarifier Tank						3							
EQT062	1140-20C No. 1 CD Brine Tank						3							
EQT063	1140-20D No. 2 CD Brine Tank						3							
EQT064	**1150-25** Emergency Aqueous Tank						3							
EQT065	**1192-1** Chlorine Neutralization Tank (North)						3							
EQT066	**1192-2** Chlorine Neutralization Tank (South)						3							
EQT067	**7000-10A** Monomer Flare			1		3								
EQT068	7000-10A.1 Diluent Tank						1							
EQT069	7000-10A.2 Pentane Tank						1							
EQT070	7000-10A.3 NMP Tank						3							

Chloroprene Unit
Agency Interest No.: 38806
E. I. DuPont de Nemours & Co. - Pontchartrain Works
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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter or Section												
		5▲	9	11	13	15	2103	2113	2115	2121	29*	51*	56	59*
EQT071	7000-10A.4 Flare Tank Separator						3							
EQT072	7000-10A.5 Mole Sieve Vent								3					
EQT073	7000-10A.6 Mole Sieve Regeneration Gas								1					
FUG001	**3-91** Chloroprene Unit - Fugitive Emissions									1				
EQT081	**1-93** LPC Emergency Flare	1		1		3								
EQT115	DCB Refining JVC Effluent Stream													
EQT116	ISOM JVC Effluent Stream													
EQT117	Caustic Scrubber Letdown													
EQT118	Water Layer Tank Letdown													
EQT119	CD Brine													
EQT120	Power Area Mole Sieve Header Knock-Out Pot Flush Water													
EQT121	Flare Stack Knock-Out Pot Water													
EQT122	Butadiene Sphere Wash Water													
EQT123	Hydroblasting Wash Water													
EQT124	Steam Trap Condensate													
EQT125	Water Washing of Columns and Equipment													
EQT126	Floor Washing & Miscellaneous Sumps													
EQT127	1192 Cleaning Blasting Pad Water													
EQT128	Greenhouse Sump Water													
EQT129	Deluge System Water													
EQT130	Safety Shower Water													
EQT131	Primary & Secondary CD Decanter NaCl Brine Water													
EQT132	Water Floatout of CD Reactors													
EQT133	ACR Decanter Aqueous Wastewater													

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* The regulations indicated above are State Only regulations.
▲ All LAC 33:III.Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.

2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.

3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR Part 60						40 CFR Part 61				40 CFR Part 63						40 CFR Part		
		A	Kb	VV	III	NNN	RRR	A	J	M	FF	A	F	G	H	UU	FFFF	64	68	82
UNF003	Chloroprene Unit	1						1		1	1	1		1			1	2	1	1
EQT003	**1110-1B** Inhibitor Make-up & Feed Tanks		3											3						
EQT004	1110-1B.1 Inhibitor Make-up Tank		3											3						
EQT005	1110-1B.2 Inhibitor Feed Tank		3											3						
EQT006	**1110-2** Refining Jets Vent System					3								1						
EQT007	1110-2.1 JVC Effluent Tank		3											3						
EQT008	1110-2.2 Pentane Column					3								1						
EQT009	1110-2.3 Heads Column					3								1						
EQT010	1110-2.4 Topper Column					3								1						
EQT011	1110-2.5 Refiner Column					3								1						
EQT012	1110-2.6 Recovery Column					3								1						
EQT013	**1110-2A** DCB Storage Tanks Condenser		3											3						
EQT014	1110-2A.1 DCB Storage Tank No. 1		3											3						
EQT015	1110-2A.2 DCB Storage Tank No. 2		3											3						
EQT016	**1110-2B** Emergency Inhibitor Make-up Tank		3											3						
EQT017	**1110-3** Isom Reactor Vent System		3			3	3							1						
EQT018	1110-3A Isom JVC Effluent Tank		3											3						
EQT019	1110-3B TEA Storage Tank		3											3						
EQT020	1110-3C TEA Burette		3											3						
EQT021	1110-3D Catalyst Mix Tank		3											3						
EQT022	1110-3E Catalyst Feed Tank		3											3						
EQT023	1110-3F Isom Purge Tank		3											3						
EQT024	1110-3H Isom Distillation Column					3								1						
EQT025	1110-3I Isom Reactors						3							1						
EQT026	**1110-4** CD Vent Condenser						3							1						
EQT027	**1110-4B** Catalyst Sludge Receiver		3											3						
EQT028	**1110-5B** Emergency Inhibitor Feed Tank		3											3						
EQT029	**1110-9** Toluene Storage Tank		3											1						
EQT030	**1110-10** Reaction Modifier Totes		3											3						

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X. Applicable Louisiana and Federal Air Quality Requirements

		40 CFR Part 60						40 CFR Part 61				40 CFR Part 63						40 CFR Part		
ID No.	Description	A	Kb	VV	III	NNN	RRR	A	J	M	FF	A	F	G	H	UU	FFFF	64	68	82
EQT031	**1110-11** Reboiler Antifoulant Totes		3											3						
FUG002	**1110-22** ACR Process - Fugitive Emissions			3					3				3		1		3			
EQT098	**1110-25** PTZ/NMP Tanks		3											3			3			
EQT099	1110-25A PTZ/NMP Make-up Tank		3											3			3			
EQT100	1110-25A.1 PTZ/NMP Make-up Tank		3											3			3			
EQT101	1110-25B PTZ/NMP Storage Tank		3											3			3			
EQT114	**1110-26** ACR Process Vent						3						3	3			1			
EQT102	1110-26A DCB Chlorinator				3		3							3			1			
EQT103	1110-26B Vacuum Pump																1			
EQT104	1110-26C MD Condenser						3							3			1			
EQT105	1110-26D MD Separator						3							3			1			
EQT106	1110-26E MD Bubble Column						3							3			1			
EQT107	1110-26F MD Pre-reactor						3							3			1			
EQT108	1110-26G ACR Chlorinator Separator				3		3							3			1			
EQT109	1110-26H ACR Chlorinator				3		3							3			1			
EQT110	1110-26I MD Heels Decanter		3											3			3			
EQT111	1110-26J Crude ACR Decanter		3											3			3			
EQT112	1110-26K Decanter Standpipe		3											3			3			
EQT113	1110-26L Chlorinated ACR Transfer Tank		3											3			3			
EQT228	1110-26M ACR/Water Decanter		3											3			3			
EQT046	**1117-1** DCB Storage Tanks Vent		1											1						
EQT047	1117-1A West Crude Tank		3											1						
EQT048	1117-1B East Crude Tank		3											1						
EQT049	1117-1C 1,4-DCB Tank		3											3						
EQT050	1117-1D Swing Tank		3											1						
EQT051	1117-1E HCl Feed Tank		3											1						
EQT052	1117-1F Waste Organic Tank		3											1						
EQT053	1117-1G t-1,4-DCB Feed Tank		1											3			3			

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR Part 60						40 CFR Part 61				40 CFR Part 63						40 CFR Part		
		A	Kb	VV	III	NNN	RRR	A	J	M	FF	A	F	G	H	UU	FFFF	64	68	82
EQT227	1117-1H Recovery Tails Tank		3											3			3			
EQT054	**1117-2** Cellosolve Storage Tank		3											3						
EQT055	**1117-3** CD Catalyst Tank		3											3						
EQT059	**1140-20** Aqueous Storage Vent Condenser		3											1						
EQT060	1140-20A Diversion Tank		3											1						
EQT061	1140-20B Aq. Clarifier Tank		3											1						
EQT062	1140-20C No. 1 CD Brine Tank		3											1						
EQT063	1140-20D No. 2 CD Brine Tank		3											1						
EQT064	**1150-25** Emergency Aqueous Tank		3											1						
EQT065	**1192-1** Chlorine Neutralization Tank (North)		3											3						
EQT066	**1192-2** Chlorine Neutralization Tank (South)		3											3						
EQT067	**7000-10A** Monomer Flare	3										1		1						
EQT068	7000-10A.1 Diluent Tank		3											3						
EQT069	7000-10A.2 Pentane Tank		3											3						
EQT070	7000-10A.3 NMP Tank		3											3						
EQT071	7000-10A.4 Flare Tank Separator		3											3						
EQT072	7000-10A.5 Mole Sieve Vent						3							1						
EQT073	7000-10A.6 Mole Sieve Regeneration Gas													3						
FUG001	**3-91** Chloroprene Unit - Fugitive Emissions			3					3						1					
EQT081	**1-93** LPC Emergency Flare	3										3								
EQT115	DCB Refining JVC Effluent Stream													1						
EQT116	ISOM JVC Effluent Stream													1						
EQT117	Caustic Scrubber Letdown													1						
EQT118	Water Layer Tank Letdown													1						
EQT119	CD Brine													1						
EQT120	Power Area Mole Sieve Header Knock-Out Pot Flush Water													1						
EQT121	Flare Stack Knock-Out Pot Water													1						
EQT122	Butadiene Sphere Wash Water													1						
EQT123	Hydroblasting Wash Water													1						

Chloroprene Unit
Agency Interest No.: 38806
E. I. DuPont de Nemours & Co. - Pontchartrain Works
Laplace, St. John the Baptist Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements

		40 CFR Part 60						40 CFR Part 61				40 CFR Part 63						40 CFR Part		
ID No.	Description	A	Kb	VV	III	NNN	RRR	A	J	M	FF	A	F	G	H	UU	FFFF	64	68	82
EQT124	Steam Trap Condensate													3						
EQT125	Water Washing of Columns and Equipment													1						
EQT126	Floor Washing & Miscellaneous Sumps													3						
EQT127	1192 Cleaning Blasting Pad Water													1						
EQT128	Greenhouse Sump Water													1						
EQT129	Deluge System Water													3						
EQT130	Safety Shower Water													3						
EQT131	Primary & Secondary CD Decanter NaCl Brine Water													1						
EQT132	Water Floatout of CD Reactors													1						
EQT133	ACR Decanter Aqueous Wastewater													3						

KEY TO MATRIX

1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.

2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.

3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
UNF003	Chloroprene Unit	40 CFR 64 Compliance Assurance Monitoring (CAM)	**EXEMPT.** The Chloroprene unit is subject to 40 CFR 63 Subparts G and H. Therefore, this unit is exempt from CAM requirements per 40 CFR 64.2(b)(1)(i).
		Chapter 51 – Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5101.A]	DOES NOT APPLY as per LAC 33:III.5101.D. The DuPont site is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51, but the Unit is also subject to NESHAP Subparts G, H, and FFFF. Compliance with NESHAP Subparts G, H, and FFFF is compliance with LAC 33:III.5109.A Facility will comply with LAC 33:III.5107.A, 5109.B, and all applicable air toxics fees provided by LAC 33:III Chapter 2.
EQT003	**1110-1B** Inhibitor Make-up and Feed Tanks	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tanks have a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tanks have capacities of 283 and 192 gallons.
		40 CFR 63.119 (Subpart G) - HON National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) for Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Storage vessels venting through this source do not meet the definition of a "storage vessel" as defined in 40 CFR 63.101. Therefore, the requirements of this Subpart do not apply.

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT004 **EQT005**	1110-1B.1 Inhibitor Make-up Tank 1110-1B.2 Inhibitor Feed Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tanks have a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tanks have capacities of 283 and 192 gallons, respectively.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tanks do not meet the definition of a "storage vessel" as defined in 40 CFR 63.101; tank capacities are less than 38 cubic meters (10,070 gallons). [40 CFR 63.119(a)]
EQT006	**1110-2** Refining Jets Vent System	LAC 33:III.2115 Control of Emissions of Organic Compounds: Waste Gas Disposal	**EXEMPT.** The vent stream from the individual sources serviced by this control system contains less than 100 pounds of VOC during any continuous 24-hour period. [LAC 33:III.2115.H.1.c] This vent services five distillation columns (1110-2.2 through 2.6) and one tank (1110-2.1).
		40 CFR 60 Subpart NNN Standards of Performance for VOC Emissions From SOCMI Distillation Operations	**DOES NOT APPLY.** The distillation units serviced by this control system have not been modified or reconstructed since December 30, 1983. [40 CFR 60.660(b)]

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT007	1110-2.1 JVC Effluent Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia, and the volume of the tank is less than 250 gallons. [LAC 23:III.2103.A] Tank capacity is 216 gallons.
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacity is 216 gallons.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Process Vent Provisions	**DOES NOT APPLY.** Tank does not meet the definition of a "storage vessel" as defined in 40 CFR 63.101; tank capacity is less than 38 cubic meters (10,070 gallons). [40 CFR 63.119(a)] Tank capacity is 216 gallons.
EQT008 **EQT009** **EQT010** **EQT011** **EQT012**	1110-2.2 Pentane Column 1110-2.3 Heads Column 1110-2.4 Topper Column 1110-2.5 Refiner Column 1110-2.6 Recovery Column	LAC 33:III.2115 Control of Emissions of Organic Compounds: Waste Gas Disposal	**EXEMPT.** Each waste gas stream has a combined weight of VOCs of less than 100 pounds in any continuous 24-hour period. [LAC 33:III.2115.H.1.c]
		40 CFR 60 Subpart NNN Standards of Performance for VOC Emissions From SOCMI Distillation Operations	**DOES NOT APPLY.** These distillation units have not been modified or reconstructed since December 30, 1983. [40 CFR 60.660(b)]

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT013	**1110-2A** DCB Storage Tanks Condenser	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A] This vent services tanks 1110-2A.1 and 1110-2A.2.
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** The tanks serviced by this condenser were constructed prior to July 23, 1984 and have not been modified. [40 CFR 60.110b(a)]
		40 CFR 63.119 (Subpart G) - HON HON From SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Storage vessels venting through this source are not subject to the HON.
EQT014 **EQT015**	1110-2A.1 DCB Storage Tank No. 1 1110-2A.2 DCB Storage Tank No. 2	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** These tanks were constructed prior to July 23, 1984 and have not been modified. [40 CFR 60.110b(a)]
	1110-2A.1 DCB Storage Tank No. 1 1110-2A.2 DCB Storage Tank No. 2	40 CFR 63.119 (Subpart G) - HON HON From SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tanks do not meet the definition of a "storage vessel" as defined in 40 CFR 63.101; tanks storing organic liquids that contain OHAPs only as impurities are not considered storage vessels. [40 CFR 63.119(a)]

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT016	**1110-2B** Emergency Inhibitor Make-up Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacity is 291 gallons.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tank does not meet the definition of a "storage vessel" as defined in 40 CFR 63.101; tank capacity is less than 38 cubic meters (10,070 gallons). [40 CFR 63.119(a)] Tank capacity is 291 gallons.

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT017	**1110-3** Isom Reactor Vent System	LAC 33:III.2115 Control of Emissions of Organic Compounds: Waste Gas Disposal	**EXEMPT.** The vent stream from the individual sources serviced by this control system contains less than 100 pounds of VOCs during any continuous 24-hour period. [LAC 33:III.2115.H.1.c] This vent services seven storage tanks (1110-3A through 3F), one distillation column (1110-3H), and two reactors (1110-3I).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** The tanks serviced by this control system have not been modified or reconstructed since July 23, 1984. [40 CFR 60.110b(a)]
		40 CFR 60 Subpart NNN Standards of Performance for VOC Emissions From SOCMI Distillation Operations	**DOES NOT APPLY.** The distillation unit serviced by this control system has not been modified or reconstructed since December 30, 1983. [40 CFR 60.660(b)]
		40 CFR 60 Subpart RRR Standards of Performance for VOC Emissions From SOCMI Reactor Processes	**DOES NOT APPLY.** The reactors serviced by this control system have not been modified or reconstructed since June 29, 1990. [40 CFR 60.700(b)]

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT018	1110-3A Isom JVC Effluent Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tank does not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacity is 635 gallons.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tank does not store an OHAP listed in Table 2 of 40 CFR 63 Subpart F as specified in 40 CFR 63.100(b)(2).

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT019 **EQT020**	1110-3B TEA Storage Tank 1110-3C TEA Burrette	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Sources emit a TAP from the Supplemental List (LAC 33:III.5112, Table 51.3). The provisions of this Section do not apply to Supplemental TAPs. Sources emit triethylamine.
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tanks have a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacities are 1,734 and 83 gallons, respectively.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tanks do not meet the definition of a storage vessel as defined in 40 CFR 63.101; tank capacity is less than 38 cubic meters (10,070 gallons). [40 CFR 63.119(a)] Tank capacities are 1,734 and 83 gallons, respectively.

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT021 **EQT022**	1110-3D Catalyst Mix Tank 1110-3E Catalyst Feed Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tanks do not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tanks have capacities of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacities are 1,190 and 6,086 gallons, respectively.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tanks do not store an OHAP listed in Table 2 of 40 CFR 63 Subpart F as specified in 40 CFR 63.100(b)(2).

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT023	1110-3F Isom Purge Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tank does not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has not been modified or reconstructed since July 23, 1984. [40 CFR 60.110b(a)]
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tank does not store an OHAP listed in Table 2 of 40 CFR 63 Subpart F as specified in 40 CFR 63.100(b)(2).
EQT024	1110-3H Isom Distillation Column	LAC 33:III.2115 Control of Emissions of Organic Compounds: Waste Gas Disposal	**EXEMPT.** The waste gas stream has a combined weight of VOCs of less than 100 pounds in any continuous 24-hour period. [LAC 33:III.2115.H.1.c]
		40 CFR 60 Subpart NNN Standards of Performance for VOC Emissions From SOCMI Distillation Operations	**DOES NOT APPLY.** Distillation unit has not been modified or reconstructed since December 30, 1983. [40 CFR 60.660(b)]

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT025	1110-3I Isom Reactors	LAC 33:III.2115 Control of Emissions of Organic Compounds: Waste Gas Disposal	**EXEMPT.** The waste gas stream has a combined weight of VOCs of less than 100 pounds in any continuous 24-hour period. [LAC 33:III.2115.H.1.c]
		40 CFR 60 Subpart RRR Standards of Performance for VOC Emissions From SOCMI Reactor Processes	**DOES NOT APPLY.** Reactors have not been modified or reconstructed since June 29, 1990. [40 CFR 60.700(b)]
EQT026	**1110-4** CD Vent Condenser	LAC 33:III.2115 Control of Emissions of Organic Compounds: Waste Gas Disposal	**EXEMPT.** The waste gas stream has a combined weight of VOCs of less than 100 pounds in any continuous 24-hour period. [LAC 33:III.2115.H.1.c]
		40 CFR 60 Subpart RRR Standards of Performance for VOC Emissions From SOCMI Reactor Processes	**DOES NOT APPLY.** The reactor system produces chloroprene which is not listed in 40 CFR 60.707. Therefore, the provisions of this Subpart do not apply to this source. [40 CFR 60.700(a)]

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT027 **EQT028**	**1110-4B** Catalyst Sludge Receiver **1110-5B** Emergency Inhibitor Feed Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** Tanks store liquids with a true vapor pressure at storage conditions of less than 1.5 psia. [LAC 23:III.2103.A]
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tanks have a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacities are 6,100 and 295 gallons, respectively.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tanks do not meet the definition of a storage vessel as defined in 40 CFR 63.101; tank capacity is less than 38 cubic meters (10,070 gallons). [40 CFR 63.119(a)] Tank capacities are 6,100 and 295 gallons, respectively.
EQT029	**1110-9** Toluene Storage Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has not been modified or reconstructed since July 23, 1984. [40 CFR 60.110b(a)]

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT030	**1110-10** Reaction Modifier Totes	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tank does not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacity is 312 gallons.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tank does not store an OHAP listed in Table 2 of 40 CFR 63 Subpart F as specified in 40 CFR 63.100(b)(2).

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT031	**1110-11** Reboiler Antifoulant Totes	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tank emits xylene and cumene. Facility-wide, emissions of these TAPs are below their respective MER. Therefore, the provisions of this Section do not apply. [LAC 33:III.5109.A]
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacity is 312 gallons.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tank does not meet the definition of a storage vessel as defined in 40 CFR 63.101; tank capacity is less than 38 cubic meters (10,070 gallons). [40 CFR 63.119(a)] Tank capacity is 312 gallons.

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
FUG002	**1110-22** ACR Process - Fugitive Emissions	LAC 33:III.2121 Control of Emissions of Organic Compounds: Fugitive Emission Control	**DOES NOT APPLY.** The ACR Unit is not an affected facility since it is not a petroleum refinery, a natural gas processing plant, a synthetic organic chemical manufacturing industry (SOCMI) unit, a methyl tertiary butyl ether (MTBE) manufacturing unit, or a polymer manufacturing unit. [LAC 33:III.2121.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** The ACR Unit does not emit TAPs. Sources of TAPs in the ACR Unit previously permitted in the Chloroprene Unit will be moved to the Neoprene Unit and permitted in the Neoprene Unit permit.
		40 CFR 60 Subpart VV Standards of Performance for Equipment Leaks of VOC in the SOCMI	**DOES NOT APPLY.** The ACR Unit does not meet the definition of a process unit as defined in 40 CFR 60.481; the ACR Unit produces 2,3-dichloro-1,3-butadiene (ACR) which is not listed in 40 CFR 60.489. [40 CFR 60.480(a)(2)]
		40 CFR 61 Subpart J National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene	**DOES NOT APPLY.** The ACR Unit does not operate in benzene service as defined in 40 CFR 61.111. [40 CFR 61.110(a)] The ACR Unit does not use or produce benzene.
		40 CFR 63 Subpart F HON From SOCMI	**DOES NOT APPLY.** The ACR Unit produces 2,3-dichloro-1,3-butadiene (ACR) which is not listed in Table 1 of Subpart F. [40 CFR 63.100(b)(1)(i)]

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
(continued) **FUG002**	**1110-22** ACR Process - Fugitive Emissions	40 CFR 63 Subpart H HON for Equipment Leaks	**DOES NOT APPLY.** The ACR Unit produces 2,3-dichloro-1,3-butadiene (ACR) which is not listed in Table 1 of Subpart F. However, DuPont has opted for the Fugitives Emissions Consolidated Program and the ACR Unit Fugitives will comply with 40 CFR Subpart H. [40 CFR 63.160(a)]
		40 CFR 63.2480 (Subpart FFFF) NESHAP: Miscellaneous Organic Chemical Manufacturing (MON)	**DOES NOT APPLY.** The ACR Unit does not have equipment *in organic HAP service* as defined in 40 CFR 63.2550. [40 CFR 63.2480(a), Table 6]

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT098 **EQT099** **EQT100** **EQT101**	**1110-25** PTZ/NMP Tanks 1110-25A PTZ/NMP Make-up Tank 1110-25A.1 PTZ/NMP Make-up Tank 1110-25B PTZ/NMP Storage Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** These tanks do not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tanks have a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)]
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tanks do not store an OHAP listed in Table 2 of 40 CFR 63 Subpart F as specified in 40 CFR 63.100(b)(2).
		40 CFR 63.2480 (Subpart FFFF) NESHAP: Miscellaneous Organic Chemical Manufacturing (MON)	**DOES NOT APPLY.** Sources do not meet the definition of a "storage tank" as defined in 40 CFR 63.2550. The tanks do not store organic HAPs and/or hydrogen halides and halogen HAPs.

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT114	**1110-26** ACR Process Vent	LAC 33:III.2115 Control of Emissions of Organic Compounds: Waste Gas Disposal	**EXEMPT.** The waste gas stream has a combined weight of VOCs of less than 100 pounds in any continuous 24-hour period. [LAC 33:III.2115.H.1.c]
		40 CFR 60 Subpart RRR Standards of Performance for VOC Emissions From SOCMI Reactor Processes	**DOES NOT APPLY.** The reactors venting through this source do not produce any chemicals listed in 40 CFR 60.707 as a product, co-product, by-product, or intermediate. Therefore, the provisions of this Subpart do not apply to this source. [40 CFR 60.700(a)]
		40 CFR 63 Subpart F HON From SOCMI	**DOES NOT APPLY.** This source is associated with the ACR Unit. The ACR Unit produces 2,3-dichloro-1,3-butadiene (ACR) which is not listed in Table 1 of Subpart F. This source does not emit any OHAP compounds. [40 CFR 63.100(b)(1)(i)]
		40 CFR 63.113 (Subpart G) - HON HON From SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Process Vent Provisions	**DOES NOT APPLY.** This source is associated with the ACR Unit. The ACR Unit produces 2,3-dichloro-1,3-butadiene (ACR) which is not listed in Table 1 of Subpart F. This source does not emit any OHAP compounds. [40 CFR 63.100(b)(1)(i)]

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT102 **EQT108** **EQT109**	1110-26A DCB Chlorinator 1110-26G ACR Chlorinator Separator 1110-26H ACR Chlorinator	LAC 33:III.2115 Control of Emissions of Organic Compounds: Waste Gas Disposal	**EXEMPT.** The waste gas streams have a combined weight of VOCs of less than 100 pounds in any continuous 24-hour period. [LAC 33:III.2115.H.1.c]
		40 CFR 60 Subpart III Standards of Performance for VOC Emissions From SOCMI Air Oxidation Unit Processes	**DOES NOT APPLY.** The reactors do not produce any chemicals listed in 40 CFR 60.617 as a product, co-product, by-product, or intermediate. Therefore, the provisions of this Subpart do not apply to these sources. [40 CFR 60.610(a)]
		40 CFR 60 Subpart RRR Standards of Performance for VOC Emissions From SOCMI Reactor Processes	**DOES NOT APPLY.** The reactors do not produce any chemicals listed in 40 CFR 60.707 as a product, co-product, by-product, or intermediate. Therefore, the provisions of this Subpart do not apply to these sources. [40 CFR 60.700(a)]
		40 CFR 63.113 (Subpart G) - HON HON From SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Process Vent Provisions	**DOES NOT APPLY.** These sources are associated with the ACR Unit. The ACR Unit produces 2,3-dichloro-1,3-butadiene (ACR) which is not listed in Table 1 of Subpart F. These sources do not emit any OHAP compounds. [40 CFR 63.100(b)(1)(i)]

Chloroprene Unit
Agency Interest No.: 38806
E. I. DuPont de Nemours & Co. - Pontchartrain Works
Laplace, St. John the Baptist Parish, Louisiana

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT104 **EQT105**	1110-26C MD Condenser 1110-26D MD Separator	LAC 33:III.2115 Control of Emissions of Organic Compounds: Waste Gas Disposal	**EXEMPT.** The waste gas streams have a combined weight of VOCs of less than 100 pounds in any continuous 24-hour period. [LAC 33:III.2115.H.1.c]
EQT106 **EQT107**	1110-26E MD Bubble Column 1110-26F MD Pre-reactor	LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Sources do not emit a toxic air pollutant (TAP).
		40 CFR 60 Subpart RRR Standards of Performance for VOC Emissions From SOCMI Reactor Processes	**DOES NOT APPLY.** The reactor system does not produce any chemicals listed in 40 CFR 60.707 as a product, co-product, by-product, or intermediate. Therefore, the provisions of this Subpart do not apply to these sources. [40 CFR 60.700(a)]
		40 CFR 63.113 (Subpart G) - HON HON From SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Process Vent Provisions	**DOES NOT APPLY.** These sources are associated with the ACR Unit. The ACR Unit produces 2,3-dichloro-1,3-butadiene (ACR) which is not listed in Table 1 of Subpart F. These sources do not emit any OHAP compounds. [40 CFR 63.100(b)(1)(i)]

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT110 **EQT111** **EQT112** **EQT113**	1110-26I MD Heels Decanter 1110-26J Crude ACR Decanter 1110-26K Decanter Standpipe 1110-26L Chlorinated ACR Transfer Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tanks do not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tanks have a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacities are 250 gallons each for 1110-26J and 3,650 gallons for 26L.
		40 CFR 63.113 (Subpart G) - HON HON From SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Process Vent Provisions	**DOES NOT APPLY.** These sources are associated with the ACR Unit. The ACR Unit produces 2,3-dichloro-1,3-butadiene (ACR) which is not listed in Table 1 of Subpart F. These sources do not emit any OHAP compounds. [40 CFR 63.100(b)(1)(i)]
		40 CFR 63.2470 (Subpart FFFF) NESHAP: Miscellaneous Organic Chemical Manufacturing (MON)	**DOES NOT APPLY.** Sources do not meet the definition of a "storage tank" as defined in 40 CFR 63.2550. The tanks do not store organic HAPs and/or hydrogen halides and halogen HAPs.

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT228	1110-26M ACR/Water Decanter	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The volume of this source is less than 250 gallons. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Source does not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Source has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)]
		40 CFR 63.113 (Subpart G) - HON HON From SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Process Vent Provisions	**DOES NOT APPLY.** Source is associated with the ACR Unit. The ACR Unit produces 2,3-dichloro-1,3-butadiene (ACR) which is not listed in Table 1 of Subpart F. This source does not emit any OHAP compounds. [40 CFR 63.100(b)(1)(i)]
		40 CFR 63.2470 (Subpart FFFF) NESHAP: Miscellaneous Organic Chemical Manufacturing (MON)	**DOES NOT APPLY.** Source does not meet the definition of a "storage tank" as defined in 40 CFR 63.2550. The source does not store organic HAPs and/or hydrogen halides and halogen HAPs.

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT046	**1117-1** DCB Storage Tanks Vent	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A] This vent services seven storage tanks (1117-1A through 1117-3G).
EQT047 **EQT048** **EQT050** **EQT052**	1117-1A West Crude Tank 1117-1B East Crude Tank 1117-1D Swing Tank 1117-1F Waste Organic Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tanks have not been modified or reconstructed since July 23, 1984. [40 CFR 60.110b(a)]

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT049	1117-1C 1,4-DCB Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tank does not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has not been modified or reconstructed since July 23, 1984. [40 CFR 60.110b(a)]
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tank does not store an OHAP listed in Table 2 of 40 CFR 63 Subpart F as specified in 40 CFR 63.100(b)(2).
EQT051	1117-1E HCl Feed Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacity is 19,320 gallons.

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT053	1117-1G t-1,4-DCB Feed Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tank does not store a toxic air pollutant (TAP).
		40 CFR 63.113 (Subpart G) - HON HON From SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Process Vent Provisions	**DOES NOT APPLY.** This source is associated with the ACR Unit. The ACR Unit produces 2,3-dichloro-1,3-butadiene (ACR) which is not listed in Table 1 of Subpart F. This source does not emit any OHAP compounds. [40 CFR 63.100(b)(1)(i)]
		40 CFR 63.2470 (Subpart FFFF) NESHAP: Miscellaneous Organic Chemical Manufacturing (MON)	**DOES NOT APPLY.** Source does not meet the definition of a "storage tank" as defined in 40 CFR 63.2550. This tank stores 1,4-DCB and does not store organic HAPs and/or hydrogen halides and halogen HAPs.

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT227	1117-1H Recovery Tails Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tank does not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacity is 19,400 gallons.
		40 CFR 63.113 (Subpart G) - HON HON From SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Process Vent Provisions	**DOES NOT APPLY.** This source is associated with the ACR Unit. The ACR Unit produces 2,3-dichloro-1,3-butadiene (ACR) which is not listed in Table 1 of Subpart F. This source does not emit any OHAP compounds. [40 CFR 63.100(b)(1)(i)]
		40 CFR 63.2470 (Subpart FFFF) NESHAP: Miscellaneous Organic Chemical Manufacturing (MON)	**DOES NOT APPLY.** Source does not meet the definition of a "storage tank" as defined in 40 CFR 63.2550. This tank does not store organic HAPs and/or hydrogen halides and halogen HAPs.

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT054	**1117-2** Cellosolve Storage Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Source emits a TAP from the Supplemental List (LAC 33:III.5112, Table 51.3). The provisions of this Section do not apply to Supplemental TAPs. Source emits glycol ethers.
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984003	**DOES NOT APPLY.** Tank has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacity is 7,098 gallons.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tank does not meet the definition of a "storage vessel" as defined in 40 CFR 63.101; tank capacity is less than 38 cubic meters (10,070 gallons). [40 CFR 63.119(a)] Tank capacity is 7,098 gallons.

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT055	**1117-3** CD Catalyst Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tank does not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacity is 9,448 gallons.
		40 CFR 63.113 (Subpart G) - HON HON From SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Process Vent Provisions	**DOES NOT APPLY.** Tank does not meet the definition of a *"storage vessel"* as defined in 40 CFR 63.101. [40 CFR 63.119] Tank does not store an organic liquid that contains an organic HAP listed in Table 2 of 40 CFR 63 Subpart F.

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT059	**1140-20** Aqueous Storage Vent Condenser	LAC 33:III.2115 Control of Emissions of Organic Compounds: Waste Gas Disposal	**EXEMPT.** Waste gas stream has a combined weight of VOCs of less than 100 pounds in any continuous 24-hour period. [LAC 33:III.2115.H.1.c] This vent services four process wastewater tanks (1140-20A through 20D).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tanks discharging though this vent have not been modified or reconstructed since July 23, 1984. [40 CFR 60.110b(a)]
EQT060 **EQT061** **EQT062** **EQT063**	1140-20A Diversion Tank 1140-20B Aqueous Storage Vent Condenser 1140-20C No. 1 CD Brine Tank 1140-20D No. 2 CD Brine Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tanks have not been modified or reconstructed since July 23, 1984. [40 CFR 60.110b(a)]

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT064	**1150-25** Emergency Aqueous Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has not been modified or reconstructed since July 23, 1984. [40 CFR 60.110b(a)]
EQT065 **EQT066**	**1192-1** Chlorine Neutralization Tank (North) **1192-2** Chlorine Neutralization Tank (South)	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** Tanks do not store a VOC. [LAC 23:III.2103.A] Tanks store caustic. Sources containing chlorine are vented through these tanks to neutralize the chlorine. Tanks act as scrubbers.
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tanks do not store a VOC. [40 CFR 60.110b(a)]
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tanks do not store an organic HAP (OHAP). [40 CFR 63.119(a)]

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT067	**7000-10A** Monomer Flare	LAC 33:III.Chapter 15 Emission Standards for Sulfur Dioxide	**DOES NOT APPLY.** The provisions of this Chapter do not apply to single point sources that emit or have the potential to emit less than 5 tons per year (tpy) of sulfur dioxide into the atmosphere. [LAC 33:III.1502.A.3 Flare emits 0.01 tpy of sulfur dioxide.]
		40 CFR 60 Subpart A Standards of Performance for New Stationary Sources – General Provisions	**DOES NOT APPLY** This flare is not used to control a source subject to New Source Performance Standards (NSPS).
EQT068	7000-10A.1 Diluent Tank	LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tank does not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacity is 19,459 gallons.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tank does not store an OHAP listed in Table 2 of 40 CFR 63 Subpart F as specified in 40 CFR 63.100(b)(2).

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT069	7000-10A.2 Pentane Tank	LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tank does not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has not been modified or reconstructed since July 23, 1984. [40 CFR 60.110b(a)]
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tank does not store an OHAP listed in Table 2 of 40 CFR 63 Subpart F as specified in 40 CFR 63.100(b)(2).

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT070	7000-10A.3 NMP Tank	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		LAC 33:III.5109 Comprehensive TAP Emission Control Program: Emission Control and Reduction Requirements and Standards	**DOES NOT APPLY.** Tank does not store a toxic air pollutant (TAP).
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacity is 5,402 gallons.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tank does not store an OHAP listed in Table 2 of 40 CFR 63 Subpart F as specified in 40 CFR 63.100(b)(2).

XI. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Description	Requirement	Compliance Method/Provision
EQT071	7000-10A.4 Flare Tank Separator	LAC 33:III.2103 Control of Emission of Organic Compounds: Storage of Volatile Organic Compounds (VOCs)	**DOES NOT APPLY.** The true vapor pressure of the liquid at storage conditions is less than 1.5 psia. [LAC 23:III.2103.A]
		40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	**DOES NOT APPLY.** Tank has a capacity of less than 75 cubic meters (19,813 gallons). [40 CFR 60.110b(a)] Tank capacity is 1,000 gallons.
		40 CFR 63.119 (Subpart G) - HON HON from SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Storage Vessel Provisions	**DOES NOT APPLY.** Tank does not meet the definition of a storage vessel as defined in 40 CFR 63.101; tank capacity is less than 38 cubic meters (10,070 gallons). [40 CFR 63.119(a)] Tank capacity is 1,000 gallons.
EQT072	7000-10A.5 Mole Sieve Vent	LAC 33:III.2115 Control of Emissions of Organic Compounds: Waste Gas Disposal	**DOES NOT APPLY.** This waste gas stream is required by the HON to implement controls that reduce VOCs to a more stringent standard than required by this Section. [LAC 33:III.2115]
		40 CFR 60 Subpart RRR Standards of Performance for VOC Emissions From SOCMI Reactor Processes	**DOES NOT APPLY.** Reactor has not been modified or reconstructed since June 29, 1990. [40 CFR 60.700(b)]

XI. Explanation for Exemption Status or Non-Applicability of a Source			
ID No:	Description	Requirement	Compliance Method/Provision
EQT073	7000-10A.6 Mole Sieve Regeneration Gas	40 CFR 63.113 (Subpart G) - HON HON From SOCMI Process Vents, Storage Vessels, Transfer Operations, and Wastewater – Process Vent Provisions	**DOES NOT APPLY.** This source does not meet the definition of a process vent as defined in 40 CFR 63.101. [40 CFR 63.113]
FUG001	**3-91** Chloroprene Unit – Fugitive Emissions	40 CFR 60 Subpart VV Standards of Performance for Equipment Leaks of VOC in the SOCMI	**DOES NOT APPLY.** The Chloroprene Unit was built prior to January 5, 1981. Changes to this unit since then do not meet the definition of a modification. [40 CFR 60.480(b)]
		40 CFR 61 Subpart J National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene	**DOES NOT APPLY.** The Chloroprene Unit does not operate in benzene service as defined in 40 CFR 61.111. [40 CFR 61.110(a)] The Chloroprene Unit does not use or produce benzene.