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DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

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Air/Toxics & Inspection Coordination Branch
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Certified Mail No 7006 2760 0000 2201 4070

Routine Air Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div.
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

January 13, 2010

RE: SOCMI HON H Fugitive Emission Monitoring Report for 2nd Half of 2009
DuPont Para-phenylenediamine (Diamines) Unit in La Place, LA
LA Air Permit: 2090-V2, Agency Interest No: 1101

Enclosed is the 2009 end of year Semi-Annual Fugitive Emissions Monitoring Report for DuPont's Para-phenylenediamine (Diamines) Unit located in La Place, Louisiana. This unit is subject to the SOCMI HON H fugitive emissions program, the most stringent of the fugitive emissions programs applicable to the facility. This routine report is being submitted as required by 40 CFR 63.182.d.1 and covers July 1 to Dec 31, 2009.

A copy of this report has also been sent to the LDEQ. If you have any questions or need any additional information, please contact me at (985) 536-5798.

Sincerely,

Sarah Beth Warren

Sarah Beth Warren
DuPont Environmental Coordinator
586 Hwy 44
LaPlace, LA 70069

Enclosures

cc: LDEQ Office of Environmental Compliance, PO Box 4312, Baton Rouge
Certified Mail No 7006 2760 0000 2201 4131

SYNTHETIC ORGANIC CHEMICAL MANUFACTURING INDUSTRY (SOCMI)
NATIONAL EMISSION STANDARDS FOR HAZARDOUS ORGANIC AIR POLLUTANTS (HON)

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Coordination Branch
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SEMIANNUAL REPORT FOR EQUIPMENT LEAKS
(40 CFR 63.182(d), SUBPART H)

1) **NAME OF FACILITY:** DuPont
LOCATION OF FACILITY: La Place, LA
PROCESS UNIT: Diamines Production Unit
REPORT PERIOD: 07/01/2009 to 12/31/2009

Section 63.168(d) – VALVES
Phase III monitoring frequency. As of 12/31/2009, this process unit had 0% leaking valves, calculated in compliance with section 63.168(e) definition of percent leaking valves as a rolling average of two consecutive annual monitoring periods. As a result, the 2009 monitoring frequency will stay at once per year (March) as specified in paragraph (d) for process units with less than 0.5% leaking valves.

(i)	JUL	AUG	SEP	OCT	NOV	DEC
Number of leaking Gas/Vapor & LL service valves detected	0	0	0	0	0	0
Percent of leaking Gas/Vapor & LL service valves	0	0	0	0	0	0
Number of Gas/Vapor & LL service valves monitored	0	0	0	0	0	0

(ii) 0 = The number of leaking Gas/Vapor & LL service valves that were not repaired within 15 days
0 = The number of non-repairable Gas/Vapor & LL service valves included in the above quantity

Section 63.163 – PUMPS
Phase III requirements apply.

(iii)	JUL	AUG	SEP	OCT	NOV	DEC
The number of leaking LL service pumps detected	0	0	0	0	0	0
The percent of leaking pumps	0	0	0	0	0	0
The number of pumps monitored	5	5	5	5	5	5
(iv)Number of leaking pumps not repaired within 15 days	0	0	0	0	0	0

Section 63.164 – COMPRESSORS (Not applicable)

(v) 0 = The number of leaking compressors detected

(vi) ---- = The number of leaking compressors that were not repaired within 15 days

Section 63.173 – AGITATORS (Not applicable)

(vii) 0 = The number of leaking Gas/Vapor & LL service agitators detected

(viii) ---- = The number of leaking Gas/Vapor & LL service agitators not repaired within 15 days

Section 63.174 – CONNECTORS

0% leaking connectors found in first quarter 1996 and in first quarter 1998. Once every four years is the monitoring frequency under Phase III. Re-monitoring of connectors, required in the first quarter 2006 was performed, and 0% leaking connectors were found. The next monitoring year will be in 2010. The alternative allowed in section 63.174 (c)(1)(ii) applies to these components.

(ix) 0 = The number of leaking Gas/Vapor & LL service connectors detected
0 = The percent of leaking Gas/Vapor & LL service connectors
0 = The number of Gas/Vapor & LL service connectors monitored

(xi) 0 = The number of leaking Gas/Vapor & LL service connectors not repaired within 15 days
0 = The number of non-repairable Gas/Vapor & LL service connectors included in the above quantity

(xiii) **EXPLAIN DELAY OF REPAIRS, IF ANY, AND WHY PROCESS UNIT SHUTDOWN WAS TECHNICALLY INFEASIBLE, APPROPRIATE.**

(xiv) **RESULTS OF MONITORING TO SHOW COMPLIANCE WITH SECTIONS 63.164(I), 63.165(A), AND 63.172(F)**

- 63.164 – Not applicable.
- 63.165(a) "Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with an instrument reading of less than 500 parts per million above background…" Zero were found leaking.
- 63.167 – All 304 open-ended lines are provided caps or plugs. Compliance is verified by periodic audits using the cap and plug location list. An audit on Sep 21 found all required caps in place.
- 63.172(f) – Annual Closed Vent System monitoring was done as scheduled in Nov 2008. No leaks were detected - see next paragraph for count.

WAS ANY ANNUAL MONITORING COMPLETED THIS PERIOD?
90 routine Closed Vent System (CVS) components and 32 difficult to monitor Closed Vent System (CVS) components were monitored in this reporting period. Zero were found leaking.

(xv) **HAS THE PLANT INITIATED MONTHLY MONITORING OF VALVES OR QIP FOR VALVES OR PUMPS.** Not applicable

(xvi) **DOES THE PLANT WISH TO CHANGE CONNECTOR MONITORING ALTERNATIVES**
Not applicable

Sarah Beth Warren — 13 Jan. 2010

Sarah Beth Warren, Environmental Coordinator — Date

A1/A1/CO

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DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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DuPont
Performance Elastomers

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January 13, 2010

Ms. Cheryl Sonnier Nolan
Assistant Secretary
Dept. of Environmental Quality
P. O. Box 4313
Baton Rouge, La. 70821-4313

CERTIFIED MAIL NO. 7008 1140 0001 6087 4225

Re: DuPont Performance Elastomers L.L.C. – Pontchartrain Site – AI#38806
40 CFR Part 63, Subpart FFFF
Periodic Report – ACR Unit

Dear Ms. Nolan:

Enclosed is the third Periodic Report under 40 CFR Part 63, Subpart FFFF, the MON MACT regulation, for the DuPont Performance Elastomers ACR Unit located in LaPlace, Louisiana. This Periodic Report covers the period of July 1 to December 31, 2009.

If you have any questions or comments, you can contact me at 985-536-5437 or at Doris.B.Grego@dupontelastomers.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

cc: Mr. David Garcia
U.S. EPA Region 6
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7008 1140 0001 6087 4232

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DUPONT PERFORMANCE ELASTOMERS L.L.C.

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

ACR UNIT

40 CFR Part 63, Subpart FFFF – PERIODIC REPORT (non-LDAR)

STARTING DATE: JULY 1, 2009

ENDING DATE: DECEMBER 31, 2009

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	David J. Pigion, Plant Manager
Signature	
Date Signed	January 13, 2010

Periodic Report for the ACR Unit
40 CFR Part 63, Subpart FFFF, §63.2520(e)
DuPont Performance Elastomers L.L.C.
Pontchartrain Site, LaPlace, Louisiana

40 CFR §63.2520(e)(1) Company Name and Address

DuPont Performance Elastomers
560 Highway 44
LaPlace, La. 70068
Contact – Doris B. Grego
Phone – 985-536-5437
e-mail – doris.b.grego@dupontelastomers.com

40 CFR §63.2520(e)(2) Statement by Responsible Official

Included with this submittal.

40 CFR §63.2520(e)(3) Reporting Period

Reporting period beginning on July 1, 2009 and ending on December 31, 2009.

40 CFR §63.2520(e)(4) SSM Malfunctions

There were no SSM in which excess emissions occurred during this reporting period.

40 CFR §63.2520(e)(5) Deviations

No deviations from the permitted limits or permit conditions were experienced during this reporting period.

40 CFR §63.2520(e)(6) CEMS

This facility is not required to have CEMs.

40 CFR §63.2520(e)(7) Operating Scenarios

There were no new operating scenarios since the notification of compliance status was submitted.

40 CFR §63.2520(e)(8) Process Unit Groups

No new process units were added to this facility.

40 CFR §63.2520(e)(9) Other Records

Heat Exchange Systems (63.104(f)(2): This facility does not have heat exchange systems that meet this definition.

Wastewater (63.146(c), (d) and (e): This facility does not have wastewater streams which contain listed HAPs.

Equipment Leaks: If complying with Subpart H, submit the information listed in §63.182(d). If complying with Subpart UU, submit the information listed in §63.1039(b). This facility has selected to comply with Subpart H. The information required under §63.182(d) is included with this report (pages 4 and 5).

Closed Vent Systems and Control Devices: This facility does not have close vent systems.

Floating Roof Tanks: This facility does not have floating roof tanks.

40 CFR §63.2520(e)(10) Notification of Process Change

There were no process changes to this facility during this reporting period that meet the requirements of this subpart.

THIRD PERIODIC REPORT
COVERS THE PERIOD OF JULY 1 TO DECEMBER 31, 2009
[Information required under 40 CFR §63.182(d)(1)]

1. NAME OF FACILITY: DuPont Performance Elastomers

PROCESS UNIT: ACR Unit – Covered under the MON

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2009					
		JUL.	AUG.	SEP.	OCT.	NOV.	DEC.
(i)	No. valves found leaking	0	-	0	-	-	0
	Percent valves leaking	0	-	0	-	-	0
	Total no. monitored	54	-	229	-	-	54
(ii)	No. leaking valves not repaired	0	-	0	-	-	0
	No. valves not repairable	0	-	0	-	-	0
(iii)	No. pumps found leaking	0	0	0	0	0	0
	Percent leaking pumps	0	0	0	0	0	0
	Total no. monitored	19	19	19	19	19	19
(iv)	No. leaking pumps not repaired	0	0	0	0	0	0
(v)	No. compressors found leaking	NA	NA	NA	NA	NA	NA
(vi)	No. leaking compressors not repaired	NA	NA	NA	NA	NA	NA
(vii)	No. agitators found leaking	NA	NA	NA	NA	NA	NA
(viii)	No. leaking agitators not repaired	NA	NA	NA	NA	NA	NA
(ix)	No. leaking connectors	0	-	0	-	-	0
	Percent connectors leaking	0	-	0	-	-	0
	Total no. monitored	369	-	356	-	-	254

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2009					
		JUL.	AUG.	SEP.	OCT.	NOV.	DEC.
(x)	Reserved						
(xi)	No. leaking connectors not repaired	0	-	0	-	-	0
	No. connectors not repairable	0	-	0	-	-	0

(xii) Reserved

(xviii) Explain delay of repairs, if any, and why process unit shutdown was technically infeasible, if appropriate.

None

(xiv) Results of monitoring to comply with:

63.164 (i) – This unit does not have compressors in organic service.

63.165 (a) – This unit does not have pressure relief devices in organic service.

63.172 (f) – Not applicable

(xv) Not applicable

(xvi) Connectors Monitoring Alternatives – Since the implementation of the fugitive emission program, this unit has used the monitoring alternative described under 63.174(c)(1)(ii).

(xvii) Not applicable

AI/AI/Co

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DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

DuPont Performance Elastomers

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January 13, 2010

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, La. 70821-4312

CERTIFIED MAIL NO. 7008 1140 0001 6087 4256

Re: DuPont Performance Elastomers L.L.C. – Pontchartrain Site – AI#38806
Polymers and Resins Group I MACT (40 CFR Part 63, Subpart U)
Periodic Report (non-LDAR) for May 16, 2009 through November 15, 2009

Enclosed is the non-equipment leak Periodic Report under 40 CFR Part 63, Subpart U, of the Polymers & Resins Group I MACT regulation, for the DuPont Performance Elastomers (DPE) Neoprene Plant located in LaPlace, Louisiana. As required by 40 CFR §63.506(e)(6)(i), this non-equipment leak Periodic Report covers the 6-month period beginning May 16, 2009 and ending on November 15, 2009.

It is our understanding that an affected source is required to submit periodic reports for equipment leaks following a separate schedule from the periodic reports covering all other requirements of the Polymers & Resins Group I MACT standard. Semi-annual LDAR reports are being submitted to your office as required under the referenced regulations.

A detailed analysis of the Periodic Report elements in 40 CFR §63.506(e)(6) is attached. Those applicable and not applicable (N/A) to DPE's Neoprene Unit are noted.

If you have any questions or need additional information, you can contact me at (985) 536-5437.

Sincerely,

Doris B. Grego

Doris B. Grego, P. E.
Environmental Technical Associate

Enclosures

cc: Mr. David Garcia
U.S. EPA Region 6
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7008 1140 0001 6087 4263

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Coordination Branch
6EN-A

DUPONT PERFORMANCE ELASTOMERS L.L.C.

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

TITLE V OPERATING PERMIT NO. 2249-V6

P&R I MACT – PERIODIC REPORT (non-LDAR)

STARTING DATE: MAY 16, 2009

ENDING DATE: NOVEMBER 15, 2009

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	David J. Pigion
Responsible Official's Title	Plant Manager
Signature	
Date Signed	January 13, 2010

Analysis of Periodic Reporting Requirement of Polymers & Resins Group I MACT, 40 CFR Part 63, Subpart U, §63.506(e)(6)
Periodic Report (non-LDAR) for DuPont Performance Elastomers L.L.C.
Pontchartrain Site, LaPlace, Louisiana
Reporting period beginning on May 16, 2009 and ending on November 15, 2009

40 CFR §63.506(e)(6)(i). Frequency of reporting and time period covered.

This paragraph refers to paragraphs (e)(6)(xi) and (e)(6)(xii) of §63.506 as potentially applicable exceptions to the requirement to submit semiannual Periodic Reports. Paragraph (e)(6)(xi) addresses emission points included in an emissions average. The affected Elastomer Product Process Unit (EPPU) is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in paragraph (e)(6)(xi) is not applicable (N/A).

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with these limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had no control or recovery devices for a particular emission point or process section that had excursions, as defined in §63.505(g), other than the items reported on page 5 of this report.

The second requirement concerning quarterly reporting under paragraph (e)(6)(xii) relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(2). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

In the absence of a requirement to submit quarterly reports, Periodic Reports are required semiannually by paragraph (e)(6)(i). The first report was required to be submitted no later than 240 days after the date the Notification of Compliance Status was due. The Notification of Compliance Status submittal deadline was November 16, 2001. The date 240 days after the November 16, 2001 date is July 14, 2002. In addition, the first Periodic Report was required to address the six-month period beginning on the date that the Notification of Compliance Status was due. Periodic Report #1 (non-LDAR) thus covered the reporting period beginning on November 16, 2001, and ending on May 15, 2002. This Periodic Report covers the six-month reporting period, beginning on May 16, 2009, and ending on November 15, 2009.

40 CFR §63.506(e)(6)(ii). Content of Periodic Reports under certain conditions.

If during the reporting period, the affected source experienced none of the compliance exceptions or activities identified in §§63.506(e)(6)(iii) through (e)(6)(ix), then the Periodic Report is to take the short form. In this case, the Periodic Report should contain a statement that there were no compliance exceptions as specified in paragraphs (e)(6)(iii) through (e)(6)(ix) of §63.506 for the six-month period covered by the report, and that none of the activities specified in those same paragraphs occurred during the same six-month period.

40 CFR §63.506(e)(6)(iii). Content of Periodic Reports under all other conditions.

This paragraph references specific information to be provided in the Periodic Report if the conditions in the preceding paragraph (e)(6)(ii) were not met during the reporting period. The paragraph applies to affected sources subject to §63.484 through 63.501 for any emission point. This equates to affected sources subject to Subpart U and having specific applicable requirements for any combination of storage vessels, continuous front-end process vents, batch front-end process vents, back-end process vents, or process wastewater. The affected EPPU identified its specific applicable requirements in its Notification of Compliance Status submittal.

The affected EPPU notes that §63.501(a) identifies the applicable requirements for maintenance wastewater as §63.105(a). The applicable requirements for maintenance wastewater do not include any requirement to report information in the Periodic Reports required by §63.506(e)(6).

40 CFR §63.506(e)(6)(iii)(A). Cross-references to specific reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Cross-reference (40 CFR)	Required Information and Applicability
§63.122(a)(4) for storage vessels	Relates to Group 1 storage vessels (N/A)
§§63.117(a)(3), 63.118(f), and 63.485(s)(5) for continuous front-end process vents	§63.117(a)(3) relates to TRE determinations or performance tests conducted after the Notification of Compliance Status (NoCS) has been submitted. - The affected EPPU had no process changes during this reporting period that required a recalculation of the TRE index value. - The affected EPPU conducted no performance tests during this reporting period. §63.118(f)(1) relates to daily average values of monitored parameters for all operating days when daily average values recorded were outside the levels established in the NoCS or the Title V operating permit - The affected EPPU had no such days during this reporting period. §63.118(f)(2) relates to Group 1 emission points with excursions caused by insufficient monitoring data (N/A). §63.118(f)(3) relates to the times and durations of periods recorded when the vent stream is diverted from its control device through a bypass line (N/A). §63.118(f)(4) relates to periods recorded when the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line valve was checked out (N/A). §63.118(f)(5) relates to periods when all pilot flames of a flare were absent (N/A). §63.118(f)(6) relates to carbon bed regeneration cycles with recorded parameters outside the levels established in the NoCS or the Title V operating permit (N/A). §63.485(s)(5) relates to Group 1 continuous front-end process vents controlled using an internal combustion engine (N/A).
§63.492 for batch front-end process vents and aggregate batch vent streams	§63.492(a) relates to information required in the NoCS (N/A). §63.492(b) relates to process changes causing a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. §63.492(c) relates to process changes that – - cause a Group 2 batch front-end process vent with annual emissions less than 11,800 kg/year to have annual emissions greater than or equal to 11,800 kg/year but not changing the Group 2 status of the batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. - or require redetermination of the batch mass input limitation (N/A). §63.492(d) specifies process changes for which reporting is not required (N/A).

Cross-reference (40 CFR)	Required Information and Applicability
§63.492 for batch front-end process vents and aggregate batch vent streams (continued)	§63.492(e) relates to information required in the Precompliance Report for alternative control devices or alternative monitoring parameters (N/A). §63.492(f) relates to affected sources required to monitor bypass lines around control devices per §63.489(d) (N/A).
§63.499 for back-end process operations	The affected EPPU has no back-end process requirements per §63.494(a)(4) (N/A).
§63.104(f)(2) for heat exchange systems	Addresses reporting requirements if the delay-of-repair provisions are invoked (N/A). Note: The affected EPPU has heat exchange systems meeting the condition specified in §63.104(a)(1)—that the heat exchange systems are operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side. Accordingly, the requirements of §63.104(a)(1) do not apply to the affected EPPU.
§63.146(c) – (g) for process wastewater	§63.146(c) relates to waste management units that receive, manage, or treat Group 1 process wastewater stream(s) or residual(s) removed from Group 1 process wastewater stream(s) (N/A). §63.146(d) relates to treatment processes for Group 1 process wastewater streams and/or residuals removed from Group 1 wastewater streams (N/A). §63.146(e) relates to control devices for organic HAP emissions from Group 1 process wastewater streams (N/A). §63.146(f) relates to owners or operators who have obtained approval to use an alternative treatment process or control device or to monitor a set of alternative parameters and therefore have alternate reporting requirements (N/A). §63.146(g) relates to extensions of time to empty and remove a Group 1 process wastewater tank equipped with a floating roof from service for inspection or repairs to the floating roof per §63.133(e)(2) or for control equipment repair per §63.133(h) (N/A)

40 CFR §63.506(e)(6)(iii)(B). Reporting requirements for excursions.

This paragraph requires the owner or operator of the affected EPPU to report the daily average values or batch cycle daily average values of monitored parameters for each excursion.

Excursions are defined by paragraphs (g) and (h) of §63.505. As noted above, §63.505(h) does not apply to the affected EPPU but §63.505(g) does. In addition, for excursions caused by lack of monitoring data, the owner or operator is to specify the start time and duration of each period when monitoring data were not collected. One excursion was experienced during this reporting period. On August 19, 2009, from 15:52:48 to 20:21:36 (approximately 4.5 hours) the brine temperature of the CD Condensers servicing the strippers was above the permit limit.

In addition, between 5/16/09 and 5/19/09 for short periods of time, totaling 3 hours and 22 minutes, the cooling media temperature of the Strippers Common Condenser was above -15°C, but the daily average temperature was below the daily average permit limit of -15°C. This is not considered an excursion.

40 CFR §63.506(e)(6)(iii)(C). [Reserved.]

40 CFR §63.506(e)(6)(iii)(D). Additional reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Citation (40 CFR §63.506)	Required Information and Applicability
(e)(6)(iii)(D)(*1*)	Supplements to the Emissions Averaging Plan, if any, per paragraph (e)(4)(iii) (N/A).
(e)(6)(iii)(D)(*2*)	Notification if a process change is made that changes the group status of any emission point from Group 2 to Group 1. - The affected EPPU had no such process changes during the reporting period.
(e)(6)(iii)(D)(*3*)	Notification of addition of one or more emission points or EPPUs to the affected source, with description and notification of the group status of the additional emission point or of all emission points in the EPPU. - The affected EPPU added no emission points or EPPUs during the reporting period.
(e)(6)(iii)(D)(*4*)	For EPPUs producing styrene-butadiene rubber by an emulsion process, notification of changes in standard operating procedures affecting carbon disulfide concentration in crumb dryer exhaust (N/A).
(e)(6)(iii)(D)(*5*)	Changes in the identity of the treatment facility or transferee receiving process wastewater streams for treatment pursuant to §63.132(g) (N/A).

40 CFR §63.506(e)(6)(iii)(E). Start-up, shutdown, and malfunction reports.

[Please note that the U.S. Environmental Protection Agency amended 40 CFR §63.10(d)(5)(i) and the final rule was published in the Federal Register on May 30, 2003 (68 FR 32586). This notice requires the submittal of a Shutdown and Malfunction Report with the Periodic Reports. The Neoprene Unit has procedures in place that meet the requirements of this regulation. Since this facility does not have a Group 1 source, it is our understanding, based on 40 CFR §63.506(b)(i), that a Shutdown and Malfunction Report is not required.]

This paragraph refers to the information required by paragraph (b)(1)(ii) of §63.506. In turn, §63.506(b)(1)(ii) requires semiannual start-up, shutdown and malfunction reports to be submitted on the same schedule as the non-LDAR Periodic Reports and to include the information specified in §63.10(d)(5)(i).

The affected EPPU notes, however, that paragraph (b)(1) of 40 CFR §63.506 does not require the owner or operator of an affected source to include Group 2 emission points in the written start-up, shutdown and malfunction plan unless the Group 2 emission points are included in an emissions average. Further, this paragraph limits the start-up, shutdown and malfunction plan requirement to control devices for equipment leaks and makes it optional for other equipment. The affected EPPU has no Group 1 emission points and no control devices for equipment leaks. Accordingly, the affected EPPU asserts that it is not required to develop and implement a written start-up, shutdown and malfunction plan pursuant to §63.506(b)(1).

Furthermore, §63.506(b)(1) states in its final sentence that reports related to the plan shall be submitted as specified in paragraph (b)(1)(ii) of §63.506. If the affected EPPU is not required by §63.506(b)(1) to have a written start-up, shutdown and malfunction plan, the affected EPPU asserts that it is also not required to submit reports related to that plan.

40 CFR §63.506(e)(6)(iv). Batch mass input limitation.

This paragraph requires the owner or operator to report once per year (i.e., in every other Periodic Report) the mass of HAPs or material input to the batch unit operation during the 12-month period covered by the current and previous Periodic Reports. In addition, the owner or operator must state whether the batch front-end process vent subject to the batch mass input limitation complied with the batch mass input limitation.

The affected EPPU indicated in its Notification of Compliance Status submittal that its determination of the group status of its set of batch front-end process vents was based on annualized emissions from maximum production of its single highest-HAP recipe. The result of this determination was that the affected EPPU's batch front-end process vents are Group 2. Consequently, the affected EPPU elected to comply with 40 CFR §63.487(g)(4) and §63.487(h). This compliance option does not require the affected EPPU to establish a batch mass input limitation. The affected EPPU made no recipe

changes during the reporting period that changed the identity or the composition of the single highest-HAP recipe on which this determination was based.

The election of the affected EPPU to comply with §63.487(h) for its batch front-end process vents invokes the reporting requirements of paragraphs (a)(5), (a)(6), and (b) of §63.492. The information in paragraphs (a)(5) and (a)(6) was included in the affected EPPU's Notification of Compliance Status submitted November 16, 2001, and is not required to be included in Periodic Reports.

§63.492(b) relates to process changes that cause a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. As noted in the table presented in the discussion above of reporting requirements under 40 CFR §63.506(e)(6)(iii)(A), the affected EPPU made no process changes during the reporting period that caused a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. Accordingly, this Periodic Report includes no notification and description of any process change as specified in 40 CFR §63.492(b).

40 CFR §63.506(e)(6)(v). Reporting of performance tests.

This paragraph specifies the information required for performance tests conducted during the reporting period. The affected EPPU did not conduct any performance tests during the period covered by this Periodic Report.

40 CFR §63.506(e)(6)(vi). Change in primary product.

This paragraph requires notification of any change in the primary product of the affected EPPU. The affected EPPU did not change its primary product during the period covered by this Periodic Report.

40 CFR §63.506(e)(6)(vii). Changes in predominant use determinations for storage tanks assigned to an affected EPPU.

The storage tanks at the affected EPPU did not require a predominant use determination. Therefore, this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(viii). Changes in predominant use determinations for recovery operations equipment assigned to an affected EPPU.

The recovery operations equipment at the affected EPPU did not require a predominant use determination. Therefore, this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(ix). Reduced recordkeeping program.

This paragraph requires notification of the owners or operator's election to comply with the recordkeeping provisions of §63.506(h)(1) as an alternative to the continuous operating parameter monitoring and recordkeeping provisions of Subpart U. The affected EPPU has made no such election, and therefore this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(x). Further reduced recordkeeping provisions.

This paragraph requires notification of the owner or operator's election not to retain daily average or batch cycle daily average values as a further reduction in recordkeeping for monitored parameters that would otherwise be subject to the Subpart U provisions for continuous operating parameter monitoring and recordkeeping, as provided by §63.506(h)(2). The affected EPPU notes that owners or operators wishing to avail themselves of this option must first comply with §63.506(h)(1) for at least six months with no excursions. The affected EPPU has not elected to comply with §63.506(h)(1). Accordingly, the affected EPPU is not eligible for this alternative, and this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(xi). Quarterly reporting requirements for emission points included in an emissions average.

The affected EPPU is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in this paragraph does not apply.

40 CFR §63.506(e)(6)(xii). Quarterly reporting requirements for emission points or EPPUs not included in an emissions average.

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has had more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with the limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had one instance when the cooling media temperature of a condenser was above the permit limit for 4.5 hours. This information is included on page 5.

The second requirement under paragraph (e)(6)(xii) concerning quarterly reporting relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(2). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

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DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

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Coordination Branch
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Certified Mail: 7006 2760 0000 2201 4148

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

February 8, 2010

Re: 2009 Annual Title V Certification for LA Permit Number 2298-V0, DuPont BDU Unit
LA Agency Interest Number: 1101

As required under 40 CFR 70.6(c)(5)(iv), E.I. DuPont de Nemours and Company, Inc. is submitting the annual certification for the Business Development Unit (BDU) unit located in LaPlace, Louisiana. It covers from January 1, 2009 through December 31, 2009.

If you have any questions or need any additional information, please contact me at (985) 536-5798.

Sincerely,

Sarah Beth Warren

Sarah Beth Warren
Environmental Coordinator

Enclosures

cc: LDEQ Office of Environmental Compliance, P.O. Box 4312, Baton Rouge, LA 70821-4312
LDEQ Southeast Regional Office, 201 Evans Road, Suite 420, New Orleans, LA 70123-5230

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 1)

Applicable Reporting Period: 01/01/09 (mm/dd/yy) **through** 12/31/09 (mm/dd/yy)

Company and Facility Identification					
Permit Number	2298-V0	**Parish**	St. John the Baptist	**Date Permit Issued**	06/06/05
Company Name	E. I. DuPont de Nemours and Company, Inc				
Facility Name	Pontchartrain Site			**Agency Interest Number**	1101
Mailing Address	586 Highway 44				
City	LaPlace	**State**	LA	**Zip Code**	70068-6912
Contact Person	Sarah Beth Warren	**Phone #**	985-536-5798	**Fax #**	985-536-5675
Principal Facility Product/Business	Facility = Business Development Unit (BDU) Product = Isophorone Diamine				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn	2-9-2010	
Responsible Official (typed)	Walter L. Glenn	**Date**	
Responsible Official Title	Plant Manager		

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Air/Toxics & Inspection
Coordination Branch
6EN-A

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 2)

Title V Permit Number: 2298-V0 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: BDU at Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier [A]	Permit Condition Number [B]	Applicable Compliance Requirement (Include Rule Citation) [C]	Method(s) or Other Means For Determining Compliance Status [D]	Permit Required Monitoring Frequency [E]	Compliance Status - See Guidance for Certification Part 2 [F]
EQT075 (1500-56C) BDU Tk Scrubber	2 - 5	Record water flowrate to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet value	Once per shift	Continuous
EQT080 (3-90) Lo Pres Scrubber	8 - 11	Record water flowrate to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet value	Once per shift	Continuous
EQT083 (4-90) Spec Tk Scrubber	15 - 16	Confirm water flow to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet notation	Once per shift	Continuous
EQT088 (1-94) Hi Pres Scrubber	17 - 18	Confirm scrubber is operating correctly [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet notation	Once per shift	Intermittent Once a day sample came back equivalent to 0.808 pph ammonia on May 7, 2009. Permit allows maximum of 0.7 pph ammonia. Sample in specification limit for following sample. (Deviation reported in the 2Q report mailed August 18.)

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting

Title V Permit Number: 2298-V0 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: BDU at Pontchartrain Site **AI Number:** 1101

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	Yes, but all previously reported.	1st Q 2009 Dev Rep not sent since no deviations to report 1st H 2009 Dev Rep sent to LDEQ cert mail postmarked Aug 18, 2009 7006 2760 0000 2201 3967 (BR) 7006 2760 0000 2201 3936 (NO) One deviation reported. 3rd Q 2009 Dev Rep not sent since no deviations to report 2nd H 2008 Dev Rep sent to LDEQ cert mail postmarked Jan 14, 2009 7006 2760 0000 2201 4124 (BR) 7006 2760 0000 2201 4087 (NO) no 4th Q deviations to report

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must minimally contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4)

Deviation Summary Report

Title V Permit Number: 2298-V0 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: BDU at Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier	Pollutant	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT075 (1500-56C) BDU Tk Scrubber	Ammonia VOC Isophorone	2 - 5	Record water flowrate to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet value	Once per shift
EQT080 (3-90) Lo Pres Scrubber	Ammonia VOC	8 - 11	Record water flowrate to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet value	Once per shift
EQT083 (4-90) Spec Tk Scrubber	VOC	15 - 16	Confirm water flow to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet notation	Once per shift
EQT088 (1-94) Hi Pres Scrubber	Ammonia VOC	17 - 18	Confirm scrubber is operating correctly [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet notation	Once per shift

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4 continued)

Deviation Summary Report

Title V Permit Number: 2298-V0 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: BDU at Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
EQT088 High Pres Scrub	7.May. 2009	20:00	8.May. 2009	20:00	24 hrs	Once a day sample came back equivalent to 0.808 pph ammonia. Permit limit is 0.7 pph ammonia. Sample in specification limit for following sample.	Sample flagged high but flag missed by operator so no resample or corrective action was taken. Incident report written and operator follow-up was made.

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4 continued)

Deviation Summary Report

Title V Permit Number: 2298-V0 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: BDU at Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
						No Deviations in 1Q09	
						No Deviations in 3Q09	
						No Deviations in 4Q09	

PERMIT NO: 2298-V0 Annual Compliance Certification

Applicable Reporting Period: January 1, 2009 through December 31, 2009

Specific Reqmnt	Citation	Emission Point	Requirement	Status	Compliant
1 7	LAC 33:III. 2107	EQT074 Railcar Load EQT078 Truck Load	Throughput recordkeeping by electronic or hard copy daily.	Records are maintained on site	Yes
2 8 13 14 15 17 19 20 21 22	LAC 33:III. 2115.K	EQT075 BDU Tk Scrub EQT080 Lo Pres Scrub EQT081 Lo Blr Col EQT082 Prod Col EQT083 Spec Tk Scrub EQT088 Hi Pres Scrub EQT089 Amination Rx EQT090 Hydrogen Rx EQT091 NH3 Rec Col EQT092 Unscrub Vent	Equipment/operating data recordkeeping to demonstrate criteria met. Records to demonstrate that VOC emissions are less than 100 lbs in any 24 hour continuous period as specified in LAC 33.III.2115.K.4	Records are maintained on site	Yes
3 4 5 6	LAC 33:III. 501.C.6	EQT075 BDU Tk Scrub	Flowrate >= 0.5 gpm, monitor and record once per shift, submit hrs operated out of range by 31 March for preceding year.	Records are maintained on site	Yes
9 10 11 12	LAC 33:III. 501.C.6	EQT080 Lo Pres Scrub	Flowrate >= 0.2 gpm if dp<=15 in or >= 2 gpm if dp > 15 in water pres, monitor and record once per shift, submit hrs operated out of range by 31 March for preceding year.	Records are maintained on site	Yes
16	LAC 33:III. 501.C.6	EQT083 Spec Tk Scrub	inspect once per shift to confirm functioning properly, check fresh water fed to seal pot, maintain record	Records are maintained on site	Yes
18	LAC 33:III. 501.C.6	EQT088 Hi Pres Scrub	inspect once per shift to confirm functioning properly, water re-circulating thru scrubber, maintain record	Records are maintained on site	Yes
23	LAC 33:III. 2111	FUG002 Fugitive Emis	mech seals or equiv on rotary pumps and compressors with true VP >= 1.5 psia	Records are maintained on site	Yes
24 25 26 29	LAC III. 1103 1109B 1303.B 2901.G	GRP010 Other	prohibits smoke across road, prohibits outdoor burning, prohibits particul across road prohibits odors >=6 butanol eq	procedures, routine patrols	Yes
27	LAC III. 2113.A.1-5	GRP010 Other	maintain best housekeeping and maintenance practices to reduce quan of organic emis	procedures, routine patrols	Yes
28	LAC 33:III. 219	GRP010 Other	pay prescribed application fees or annual fees <=90 days due	procedures	Yes

PERMIT NO: 2298-V0 Annual Compliance Certification
Applicable Reporting Period: January 1, 2009 through December 31, 2009

30 31 33 34 32	LAC 33:III. 501.C.6	GRP010 Other	-total VOC <= 1.528 tpy -ammonia <=3.34 tpy -ethylene glycol <=0.001 tpy -isophorone <= 0.001 tpy -may produce similar diam as long as not exceed permit limit	Reports are maintained on site	Yes
35 36 37 38	LAC 33:III. 5105.A.1 5105.A.2 5105.A.3 5105.A.4	GRP010 Other	don't construct new stat source no violation of ambient air std nothing to conceal emission keep records, notify, report	procedures, routine patrols	Yes
39 40 41 42 43 44 45	LAC 33:III. 5107.A.2 5107.A.2 5107.B.1 5107.B.2 5107.B.3 5107.B.4 5107.B.5	GRP010 Other	submit TEDI by 1 July submit annual certification emerg = Public Safety < 1 hr bypass = Compliance <24 hr >permit = Compliance <24 hrs written follow-up <= 7 days report SRV, fail, bypass qty	procedures	Yes
46 47	LAC 33:III. 5109.B.3 5109.B	GRP010 Other	compliance w ambient air std status beyond fence	procedures, routine patrols	Yes
48	LAC 33:III. 5109.C	GRP010 Other	SOP to ensure compliance with applic std is maintained	procedures	Yes
49 50 51	LAC 33:III. 5111.A.1 5111.A.2.a 5111.A	GRP010 Other	obtain LA air permit obtain permit mod if emis incr don't construct w/o DEQ auth	procedures	Yes
52-60	LAC 33:III. 5113	GRP010 Other	Emission Test requirements	procedures	Yes
61-64	LAC 33:III. 5611	GRP010 Other	Preplanned abatement strategy when alert, warning, emerg	procedures	Yes
65-66	40 CFR 68	GRP010 Other	Hazard Assessment	procedures	Yes
67-68	LAC 33:III. 5911	GRP010 Other	Risk Management registration submit amended reg if change	procedures	Yes
69	LAC 33:III. 919	GRP010 Other	Submit EIS by 31 March for preceding year.	procedures	Yes
70	LAC 33:III. 927	GRP010 Other	Report unauthorized discharge of any air pollutant	procedures	Yes
71-72	NESHAP FF 40 CFR 61 61.342 61.355(c) 61.357(a)	Facility	Submit initial report. Maintain records for each waste stream subject to this subpart	The initial report was submitted in 1993. The records are maintained onsite.	Yes
73 74 75	40 CFR 70. 5(a)(1)(iii) 6(a)(3)(iii) 6(c)(5)(iv)	GRP010 Other	TVpermit renewal >=180 days report TV deviations quarterly (can combine w semi annual) certify TVcompliance annually	procedures	Yes

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DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

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Air/Toxics & Inspection
Coordination Branch
6EN-A

Certified Mail: 7006 2760 0000 2201 4179

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

February 8, 2010

Re: Annual Title V Certification for LA Permit Number 896-V0, DuPont Power Unit
LA Agency Interest Number: 1101

As required under 40 CFR 70.6(c)(5)(iv), E.I. DuPont de Nemours and Company, Inc. is submitting the annual certification for the Power unit located in LaPlace, Louisiana. It covers from January 1, 2009 through December 31, 2009.

If you have any questions or need any additional information, please contact me at (985) 536-5798.

Sincerely,

Sarah Beth Warren

Sarah Beth Warren
Environmental Coordinator

Enclosures

cc: LDEQ Office of Environmental Compliance, P.O. Box 4312, Baton Rouge, LA 70821-4312
Southeast Regional Office; 201 Evans Road, Suite 420, New Orleans, LA 70123-5230

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 1)

Applicable Reporting Period: 01/01/09 (mm/dd/yy) to 12/31/09 (mm/dd/yy)

Company and Facility Identification					
Permit Number	896-V0	Parish	St. John the Baptist	Date Permit Issued	09/28/05
Company Name	E. I. DuPont de Nemours and Company, Inc				
Facility Name	Pontchartrain Site			Agency Interest Number	1101
Mailing Address	586 Highway 44				
City	LaPlace	State	LA	Zip Code	70068-6912
Contact Person	Sarah Beth Warren	Phone #	985-536-5798	Fax #	985-536-5675
Principal Facility Product/Business	Plant Services including Steam and Firewater				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 2-9-2010		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 2)

Title V Permit Number: 896-V0 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Power Unit at Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier [A]	Permit Condition Number [B]	Applicable Compliance Requirement (Include Rule Citation) [C]	Method(s) or Other Means For Determining Compliance Status [D]	Permit Required Monitoring Frequency [E]	Compliance Status - See Guidance for Certification Part 2 [F]
EQT095 (1-90) Gasoline Stor Tnk	1 - 2	Equipped with submerged fill pipe [LAC 33:III.2103.A, LAC 33:III.5109.A]	Tank design documents	none stated	Continuous

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Coordination Branch
8EN-A

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting		
Title V Permit Number: 896-V0 **Company Name:** E. I. DuPont de Nemours and Company, Inc		
Facility Name: Power Unit at Pontchartrain Site **AI Number:** 1101		
Question	**Response (Yes/No)**	**If the deviations have been previously reported, please reference below the report and date of the report.**
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	**Yes, but previously reported**	1H 2009 Report mailed via certified mail August 18; certified mail number 7006 2760 0000 2201 3929 sent to Baton Rouge; certified mail number 7006 2760 0000 2201 3912 sent to New Orleans

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must minimally contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4)

Deviation Summary Report

Title V Permit Number: 896-V0 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Power Unit at Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier	Pollutant	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT095 (1-90) Gasoline Stor Tnk	BTEX n-hexane	1 - 2	Equipped with submerged fill pipe [LAC 33:III.2103.A, LAC 33:III.5109.A]	Tank design documents	none stated

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4 continued)

Deviation Summary Report

Title V Permit Number: 896-V0 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Power Unit at Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
EQT 103, EQT 114	18.May .2009	22:30	19.May .2009	7:40	9.17	Per page P183 of the log book, air header pressure could not be maintained with two rental compressors; a third back-up unit was run during the stated time frame to prevent the Diamines plant from interlocking down. Allowing the plant to interlock down would have resulted in much greater start-up and shutdown emissions.	Third compressor was shutdown as soon as the plant could operate without interlocking down. Running the third back-up compressor was a first line supervisor's call.
EQT 103 , EQT 114	20.May. 2009	16:00	21.May. 2009	13:50	21.83	Per page P185 of the log book, air header pressure could not be maintained with two rental compressors; a third back-up unit was run during the stated time frame to prevent the Diamines plant from interlocking down. Allowing the plant to interlock down would have resulted in much greater start-up and shutdown emissions.	Third compressor was shutdown as soon as the plant could operate without interlocking down. Running the third back-up compressor was a first line supervisor's call.

PERMIT NO: 896-V0 Annual Compliance Certification

Applicable Reporting Period: January 1, 2009 to December 31, 2009

Specific Reqmnt	Citation	Emission Point	Requirement	Status	Compliant
1	LAC 33:III. 2103.A	EQT095 Gasoline Tnk	Equip with a submerged fill pipe.	Equip Design Records	Yes
2	LAC 33:III. 2107	EQT095 Gasoline Tnk	Control Air Toxics to MACT= Equiped w submerged fill pipe	Equip Design Records	Yes
3 5 7 9 17 19 21	LAC 33:III. 1311.C	EQT101 Diesel Gen EQT103 Rent Air Comp#1 EQT104 #2 Fire P Stack EQT106 #4 Fire P Stack EQT110 #5 Fire P Stack EQT112 #6 Fire P Stack EQT114 Rent Air Comp#2	Opacity > 20 percent for not more than one 6 minute period in any 60 consecutive minutes, otherwise <= 20 percent	controlled by maintenance and use of No2 fuel oil	Yes
4 6 8 10 18 20 22	LAC 33:III. 1503.C	EQT101 Diesel Gen EQT103 Rent Air Comp#1 EQT104 #2 Fire P Stack EQT106 #4 Fire P Stack EQT110 #5 Fire P Stack EQT112 #6 Fire P Stack EQT114 Rent Air Comp#2	Sulfur dioxide <= 2000 ppmv at std cond, 3 hr av	controlled by maintenance and use of No2 fuel oil	Yes
11 14	LAC 33:III. 1001.B	EQT108 #1 Boiler EQT109 #2 Boiler	Opacity > 20 percent for not more than one 6 minute period in any 60 consecutive minutes, otherwise <= 20 percent	complies by using sweet natural gas as fuel	Yes
12 15	LAC 33:III. 1313.C	EQT108 #1 Boiler EQT109 #2 Boiler	Total suspended particulate <=0.6 lb/MM BTU of heat input	complies by using sweet natural gas as fuel	Yes
13 16	LAC 33:III. 1503.C	EQT108 #1 Boiler EQT109 #2 Boiler	Sulfur dioxide <= 2000 ppmv at std cond, 3 hr av	complies by using sweet natural gas as fuel	Yes
23 24 25 28	LAC III. 1103 1109B 1303.B 2901.G	GRP011 Other	prohibits smoke across road, prohibits outdoor burning, prohibits particul across road prohibits odors >=6 butanol eq	procedures, routine patrols	Yes
26	LAC III. 2113.A.1-5	GRP011 Other	maintain best housekeeping and maintenance practices to reduce quan of organic emis	procedures, routine patrols	Yes
27	LAC 33:III. 219	GRP011 Other	pay prescribed application fees or annual fees <=90 days due	procedures	Yes
29 30 31 32 33 34	LAC 33:III. 501.C.6	GRP011 Power Area	CO <=236.32 tpy NO <=798.55 tpy particulate <=26.03 tpy SO2 <= 4.15 tpy total VOC <= 35.06 tpy Sulfuric Acid <= 0.002 tpy	Reports are maintained on site	Yes

PERMIT NO: 896-V0 Annual Compliance Certification
Applicable Reporting Period: January 1, 2009 to December 31, 2009

35 36 37 38 39	LAC 33:III. 501.C.6	GRP011 Power Area	Benzene <= 0.004 tpy Ethyl Benzene <=0.001 tpy toluene <= 0.012 tpy Xylene Isomers <= 0.004 tpy n-Hexane <= 0.01 tpy	Reports are maintained on site	Yes
40 41 42 43	LAC 33:III. 5105.A.1 5105.A.2 5105.A.3 5105.A.4	GRP011 Power Area	don't construct new stat source no violation of ambient air std nothing to conceal emission keep records, notify, report	procedures, routine patrols	Yes
44 45 46 47 48 49 50	LAC 33:III. 5107.A.2 5107.A.2 5107.B.1 5107.B.2 5107.B.3 5107.B.4 5107.B.5	GRP011 Facility	submit ERIC by May 15th submit annual certification emerg = Public Safety < 1 hr bypass = Compliance <24 hr >permit = Compliance <24 hrs written follow-up <= 7 days report SRV, fail, bypass qty	procedures	Yes
51 52	LAC 33:III. 5109.B.3 5109.B	GRP011 Power Area	compliance w ambient air std status beyond fence	procedures, routine patrols	Yes
53	LAC 33:III. 5109.C	GRP011 Power Area	SOP to ensure compliance with applic std is maintained	procedures	Yes
54 55 56	LAC 33:III. 5111.A.1 5111.A.2.a 5111.A	GRP011 Power Area	obtain LA air permit obtain permit mod if emis incr don't construct w/o DEQ auth	procedures	Yes
57-65	LAC 33:III. 5113	GRP011 Power Area	Emission Test requirements	procedures	Yes
66-69	LAC 33:III. 5611	GRP011 Facility	Preplanned abatement strategy when alert, warning, emerg	procedures	Yes
70-71	40 CFR 68	GRP011 Power Area	Hazard Assessment	procedures	Yes
72-73	LAC 33:III. 5911	GRP011 Facility	Risk Management registration submit amended reg if change	procedures	Yes
74	LAC 33:III. 919	GRP011 Facility	~~Submit EIS by 31 March for preceding year.~~	procedures	Yes
75	LAC 33:III. 927	GRP011 Power Area	Report unauthorized discharge of any air pollutant	procedures	Yes
76	NESHAP FF 40 CFR 61 61.342 61.355(c) 61.357(a)	GRP011 Facility	Submit initial report. Maintain records for each waste stream containing Benzene subject to this subpart	The initial report was submitted in 1993. The records are maintained onsite.	Yes
77 78-79 75	40 CFR 70. 5(a)(1)(iii) 6(a)(3)(iii) 6(c)(5)(iv)	GRP011 Power Area	TVpermit renewal >=180 days report TV deviations quarterly (can combine w semi annual) certify TVcompliance annually	procedures	Yes

A/AI/CO 11000699504

DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

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Certified Mail: 7006 2760 0000 2201 4186

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

February 8, 2010

Re: Annual Title V Certification for LA Permit Number 2090-V2
LA Agency Interest Number: 1101

As required under 40 CFR 70.6(c)(5)(iv), E.I. DuPont de Nemours and Company, Inc. is submitting the annual certification for the Diamines unit located in LaPlace, Louisiana for the period of January 1, 2009 through December 31, 2009.

If you have any questions or need any additional information, please contact me at (985) 536-5798.

Sincerely,

Sarah Beth Warren

Sarah Beth Warren
Environmental Coordinator

Enclosures

cc: LDEQ Office of Environmental Compliance, P.O. Box 4312, Baton Rouge, LA 70821-4312
LDEQ Southeast Regional Office, 201 Evans Road, Suite 420, New Orleans, LA 70123-5230

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 1)

Applicable Reporting Period: 01/01/09 (mm/dd/yy) to 12/31/09 (mm/dd/yy)

Company and Facility Identification					
Permit Number	2090-V2	Parish	St. John the Baptist	Date Permit Issued	9/23/08
Company Name	E. I. DuPont de Nemours and Company, Inc				
Facility Name	Pontchartrain Site			Agency Interest Number	1101
Mailing Address	586 Highway 44				
City	LaPlace	State	LA	Zip Code	70068-6912
Contact Person	Sarah Beth Warren	Phone #	985-536-5798	Fax #	985-536-5675
Principal Facility Product/Business	p-phenylenediamine				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn	2-9-2010	
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		

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Coordination Branch
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Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 2)

Title V Permit Number: 2090-V2 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier [A]	Permit Condition Number [B]	Applicable Compliance Requirement (Include Rule Citation) [C]	Method(s) or Other Means For Determining Compliance Status [D]	Permit Required Monitoring Frequency [E]	Compliance Status - See Guidance for Certification Part 2 [F]
EQT0012 1500-8 Crude Tank Scrubber	27	Scrub to reduce HAP emissions 95% [LAC 33:III.501.C.6]	Monitor and record the water scrubber flowrate. Minimum flowrate is 400 pph.	Every 15 minutes	Intermittent – due to outage that occurred on Apr 29 no process data was recorded for one hour. A deviation also occurred on May 19.
EQT0015 1500-11 Product Storage Tank Scrubber	47	Flowrate >= 450 pph [LAC 33:III.501.C.6]	Continuous monitoring by data acquisition system. Manual readings taken by operators if there is an outage of the data acquisition system.	Every 12 hours (1/shift)	Continuous.
EQT0024 1500-17/18 Tank Scrubber	74	Flowrate >= 0.5 gpm [LAC 33:III.501.C.6]	Record flowrate once every 12 hours (1/shift)	Every 12 hours (1/shift)	Continuous.
EQT0030-31 1500-66 & 34 FVH Flare	98 & 118	Reduce Benzene emissions 95% [40CFR61.271(c)(2)]	Presence of a flame	Every 1 hour	Intermittent – due to outage that occurred on Apr 29 no process data was recorded for one hour.
EQT0051 1500-38 Hydrogenate Tank Scrubber	213	Scrub to reduce HAP emissions 95% [LAC 33:III.501.C.6]	Monitor and record the water scrubber flowrate. Minimum flowrate is 250 pph.	Every 15 minutes	Intermittent – due to outage that occurred on Apr 29 no process data was recorded for one hour. A deviation also occurred on May 19.
EQT0055 1500-45 Product Loading Scrubber	224	Flowrate >= 400 pph [LAC 33:III.501.C.6]	Record flowrate once every 12 hours (1/shift) when rack in service	Every 12 hours (1/shift)	Continuous.
EQT0063 1500-60 Synthesis Flare	262	Reduce TAP emissions 98% [LAC 33:III.5109.A]	Presence of a flame	Every 1 hour	Intermittent – due to outage that occurred on Apr 29 no process data was recorded for one hour.
EQT0072 1500-65 Truck Loading Scrubber / Off-Quality Scrubber	296	Flowrate >= 450 pph [LAC 33:III.501.C.6]	Record flowrate once every 12 hours (1/shift)	Every 12 hours (1/shift)	Continuous.

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting

Title V Permit Number: 2090-V2 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Diamines Unit at Pontchartrain Site **AI Number:** 1101

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	Yes, but all previously reported.	1st Q 2009 no deviations to report 1st H 2009 Monitoring Report cert mail postmarked Aug 18, 2009 7006 2760 0000 2201 3943 (BR) 7006 2760 0000 2201 3950 (NO) 3rd Q 2009 no deviations to report 2nd H 2009 Monitoring Report cert mail dated Jan 14, 2009 7006 2760 0000 2201 4094 (BR) 7006 2760 0000 2201 4063 (NO)

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must minimally contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4)

Deviation Summary Report

Title V Permit Number: 2090-V2 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier	Pollutant	Permit condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT0012 1500-8 Crude Tank Scrubber	Aniline OPDA PPDA	27	Scrub to reduce HAP emissions 95% [LAC 33:III.501.C.6]	Monitor and record the water scrubber flowrate. Minimum flowrate is 400 pph.	Every 15 minutes
EQT0015 1500-11 Product Storage Tank Scrubber	OPDA PPDA	47	Flowrate >= 450 pph [LAC 33:III.501.C.6]	Monitor and record the water scrubber flowrate.	Every 12 hours (1/shift)
EQT0024 1500-17/18 Tank Scrubber	Ammonia Aniline Benzene	74	Flowrate >= 0.5 gpm [LAC 33:III.501.C.6]	Monitor and record the water scrubber flowrate.	Every 12 hours (1/shift)
EQT0030-31 1500-66 & 34 FVH Flare	Ammonia Aniline Benzene OPDA PPDA	98 & 118	Reduce Benzene emissions 95% [40CFR61.271(c)(2)]	Presence of a flame	Every 1 hour
EQT0051 1500-38 Hydrogenate Tank Scrubber	Ammonia Aniline Benzene OPDA PPDA	213	Scrub to reduce HAP emissions 95% [LAC 33:III.501.C.6]	Monitor and record the water scrubber flowrate. Minimum flowrate is 250 pph.	Every 15 minutes
EQT0055 1500-45 Product Loading Scrubber	Ammonia Benzene OPDA PPDA	224	Flowrate >= 400 pph [LAC 33:III.501.C.6]	Monitor and record the water scrubber flowrate when rack in service	Every 12 hours (1/shift)
EQT0063 1500-60 Synthesis Flare	Ammonia Aniline Benzene	262	Reduce TAP emissions 98% [LAC 33:III.5109.A]	Presence of a flame	Every 1 hour
EQT0072 1500-65 Truck Loading Scrubber / Off-Quality Scrubber	OPDA PPDA	296	Flowrate >= 450 pph [LAC 33:III.501.C.6]	Monitor and record the water scrubber flowrate.	Every 12 hours (1/shift)

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4 continued)

Deviation Summary Report

Title V Permit Number: 2090-V2 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
EQT0063	4/29/2009	08:30	4/29/2009	11:00	2.5	Data historian and Honeywell both lost power during a Honeywell migration.	Restored data collection systems as soon as possible.
EQT0051	5/19/2009	1:00	5/19/2009	2:00	1.0	Not known.	Issue corrected itself within the hour.
EQT0012	5/19/2009	1:00	5/19/2009	2:00	1.0	Not known.	Issue corrected itself within the hour.
All process variables	10/15/2009	11:00	10/15/2009	12:00	1.0	UPS migration caused a data historian outage.	Restored data historian system.
EQT0032	10/21/2009	7:00	10/21/2009	12:00	5.0	Not known. Natural gas heating value dropped below minimum permit condition.	Issue corrected itself.

A1/A1/CO L804.10 110025329491.

DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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DuPont
Performance Elastomers

March 23, 2010

Dept. of Environmental Quality
Office of Environmental Compliance
Title V Program
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7008 1140 0001 6087 4379

Re: 2009 - Second Semiannual Report and Annual Certification for Permit No. 206-V0, AI # - 38806, HCl Unit

As required under the referenced permit (Part 70 General Condition R.3 and Louisiana Air Emission Permit, General Condition No. XI.C), DuPont Performance Elastomers L.L.C. is submitting the second semiannual report for the HCl Recovery Unit. Also included, as required under 40 CFR 70.6(c)(5)(iv), is the 2009 Annual Certification of Compliance for this unit. A line by line certification statement is available at our site for review.

If you have any questions or need additional information you can contact me at (985) 536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

cc: Mr. Steve Thompson
Air Enforcement Section (6EN-AA)
1445 Ross Avenue
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7008 1140 0001 6087 4409

ATTACHMENT 1
2009 ANNUAL COMPLIANCE CERTIFICATION
HCL RECOVERY UNIT
PERMIT 206-V0

Louisiana DEQ Title V Annual Compliance Certification Form
DuPont Performance Elastomers, HCl Unit
(Certification Part 1)

Applicable Reporting Period: 01/01/09 (mm/dd/yy) to 12/31/09 (mm/dd/yy)

Company and Facility Identification					
Permit Number	206-V0	Parish	St. John the Baptist	Date Permit Issued	Jan. 12, 2005
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site, HCl Recovery Unit			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	David J. Pigion	Date	3/23/2010
Responsible Official Title	Plant Manger		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting		
Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.		
Facility Name: Pontchartrain Site **AI Number:** 38806		
Question	**Response (Yes/No)**	**If the deviations have been previously reported, please reference below the report and date of the report.**
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	Yes	Attached are copies of the two 2009 semiannual reports. All deviations were included with these reports

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

A line by line certification statement is available at our site for review.

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ATTACHMENT 2
2009 SECOND SEMIANNUAL REPORT
HCL RECOVERY UNIT
PERMIT 206-V0

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Applicable Reporting Period: 07/01/09 (mm/dd/yy) to 12/31/09 (mm/dd/yy)

Company and Facility Identification					
Permit Number	206-V0	Parish	St. John the Baptist	Date Permit Issued	Jan. 12, 2005
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site, HCl Recovery Unit			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	David J. Pigion	Date	3/23/2010
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Reporting

Title V Permit Number: 206-V0 **Company Name:** Dupont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	Yes	

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
1180-21 EQT-82	HCl	1	Inspect the HCl Product Tank's Scrubber at least once per shift to confirm the scrubber is functioning properly.	This scrubber is inspected once per shift.	Once per shift
1180-21.1, 21.2 and 21.3 EQTs-83, 84 and 85	HCl	1	Maintain product acid concentration above 3%. Perform product concentration tests at least once per shift.	Specific gravity tests are performed on the acid once per shift.	Once per shift
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	1	Hazardous waste combusted at this unit is limited to the following rates – 40MM lb/yr Onsite Chlorinated Organic; 20 MM lb/yr Offsite Chlorinated Organic; 8 MM lbs/yr Miscellaneous.	Monthly reports are issued on the amount of waste combusted in this unit.	Yearly
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2, 4, 6	Hazardous liquid feed rate for each burner – Max at 2500 lbs/hr; Total of 5000 lbs/hr. Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2, 4, 6	Combustion Chamber pressure -0.1 in. water (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring.	Continuous

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2, 4, 6	Combustion Chamber temperature 1800°F (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2, 4, 6	Dynawave scrubber – pH – 2.0 (min) Dynawave scrubber differential pressure 10 in. water (minimum Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2	ORP – 50 millivolts (minimum) If ORP values drop below minimum, the unit shall be taken off load until values are above minimum for 10 minutes.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2,4	Carbon Monoxide concentration – one hour rolling average corrected to 7% oxygen – 100 ppm (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2	Halide content of waste feed – 20 wt % (minimum) 60 wt% (maximum)	Each waste batch is sampled before sending it to the Feed Tanks.	Not specified

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2	Acid concentration of product – 3% (minimum)	Specific gravity tests are performed on the acid once per shift.	Not specified.
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2, 4	Oxygen in the flue gas – 2% (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring.	Not specified.
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2	Dynawave scrubber effluent/feed ratio – 0.12 (minimum)	Continuous monitoring.	Not specified.
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	3	Vent Scrubber make up water – 300 lbs/hr (minimum one unit) 600 lbs/hr (minimum two units)	Continuous monitoring.	Not specified.
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	4	The permittee shall test the automatic cut-off system monthly.	Automatic cut-off system is tested as a minimum on a monthly basis.	Monthly
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	5	The permittee shall shut down the HCl Unit if any of the following occur. Loss of combustion air Power outage Loss of instrument air Loss of cooling water High temperature in the primary Absorber	Systems and procedures are in place to comply with this requirement.	As needed.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	6A	The permittee shall install, maintain and calibrate continuous CO and oxygen analyzers.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	6	Combustion air flow shall be monitored continuously when the unit is in operation.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	7	The permittee shall test metal concentration in the chlorinated hydrocarbon feed as specified by the LDEQ Hazardous Waste Division.	Waste feed stream is sampled once per year as required under the Hazardous Waste Regulations.	Yearly
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	8	Particulate concentrations in the flue gas shall not exceed 0.04 grains/dscf at 7% oxygen by volume.	Stack test was performed as required under the Hazardous Waste Regulations, this source meets this emission limit.	Not specified
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	9	The permittee shall comply with all applicable regulations of the LDEQ Hazardous Waste Division	This unit is inspected regularly by the LDEQ Hazardous Waste Division and it has been found in compliance with all regulations.	Continuous
7000-17 EQT87	Chloroprene, Toluene, Non Tox VOCs	1	Inspect the HCl Feed Tank's Scrubber to confirm scrubber is functioning properly.	Scrubber is inspected once per shift.	Once per shift
7000-17 EQT87	Chloroprene, Toluene, Non Tox VOCs	2, 3	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
7000-17.1 EQT88	Chloroprene, Toluene, Non Tox VOCs	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified
7000-17.2 EQT89	Chloroprene, Toluene, Non Tox VOCs	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified
2-74 EQT90	Chloroprene, Toluene, Non Tox VOCs, HCl	1	Condenser water temperature of 55°F (12.8°C) – maximum	Continuous monitoring.	Once per shift
2-74.1 EQT91	Chloroprene, Toluene, Non Tox VOCs, HCl	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified
2-74.2 EQT92	Chloroprene, Toluene, Non Tox VOCs, HCl	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified
2-74.3 EQT931	Chloroprene, Toluene, Non Tox VOCs, HCl	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified
2-74.4 EQT94	Chloroprene, Toluene, Non Tox VOCs, HCl	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified
2-74.5 EQT95	Chloroprene, Toluene, Non Tox VOCs, HCl	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
3-96 FUG3	Chloroprene, Toluene, Non Tox VOCs, HCl	1-12	The HCl Unit shall comply with the fugitive emissions regulations of 40CFR264, Subpart BB (hazardous waste) and 40CFR 63 Subpart H under the HON.	A fugitive emission program has been implemented at this unit which complies with both set of regulations. Semi-annual reports are sent to the LDEQ.	Monitoring as required (weekly, monthly and/or annual.)

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
7000-17	12/15	Night Shift	NA	NA	NA	Night shift operator did not check the scrubber during his shift.	None. Deviation was found after the shift was over. Could not take reading.
2-74	9/10	10:11 am	9/10	11:48 am	1 hr 37 min	Problems with condenser	Repaired condenser
	10/12	3:00 pm	10/13	3:59 pm	13 hours	Problems with condenser	Repaired condenser

ATTACHMENT I

Semiannual Deviation Report
For the Period of July 1 to December 31, 2009

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
1180-21 EQT-82	1	Inspect the HCl Product Tank's Scrubber at least once per shift to confirm the scrubber is functioning properly.	Inspections of the HCl Product Tank's Scrubber is documented in the Turnover Database, Monomer-Chlorine Services Log. All readings were taken during this reporting period.
1180-21.1, 21.2 and 21.3 EQTs-83, 84 and 85	1	Maintain product acid concentration above 3%. Perform product concentration tests at least once per shift.	Acid concentration is measured continuously while the unit is in operation. A review of the acid concentration readings for the reporting period shows the acid concentration was above 3% while the unit was in operation.
7000-15 EQT86	1	Hazardous waste combusted at this unit is limited to the following rates – 40MM lb/yr Onsite Chlorinated Organic; 20 MM lb/yr Offsite Chlorinated Organic; 8 MM lbs/yr Miscellaneous.	The total amount of waste combusted at this unit for 2009 was 9.2 MM pounds.
7000-15 EQT86	2, 4, 6	Hazardous liquid feed rate for each burner – Max at 2500 lbs/hr; Total of 5000 lbs/hr. Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the feed shows this unit operated within the permit limits for this reporting period.
7000-15 EQT86	2, 4, 6	Combustion Chamber pressure -0.1 in. water (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Combustion Chamber pressure shows this pressure was within permit limits while the unit was in operation.
7000-15 EQT86	2, 4, 6	Combustion Chamber temperature 1800°F (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Combustion Chamber temperature shows this temperature was within permit limits while the unit was in operation.
7000-15 EQT86	2, 4, 6	Dynawave scrubber – pH – 2.0 (min) Dynawave scrubber differential pressure 10 in. water (minimum Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Dynawave scrubber pH and differential pressure shows both parameters within permit limits while the unit was in operation.

ATTACHMENT I (continued)
Semiannual Deviation Report
For the Period of July 1 to December 31, 2009

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
7000-15 EQT86	2	ORP – 50 millivolts (minimum) If ORP values drop below minimum, the unit shall be taken off load until values are above minimum for 10 minutes.	A review of the continuous monitoring records of the Dynawave scrubber ORP shows the ORP was within permit limits while the unit was in operation.
7000-15 EQT86	2, 4	Carbon Monoxide concentration – one hour rolling average corrected to 7% oxygen – 100 ppm (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the CO_2 concentration shows the value was within permit limits while the unit was in operation.
7000-15 EQT86	2	Halide content of waste feed – 20 wt % (minimum) 60 wt% (maximum)	Tests performed on the waste feed, during this reporting period, show the halide content was within the permit limits.
7000-15 EQT86	2	Acid concentration of product – 3% (minimum)	A review of the acid concentration readings for the reporting reading show the acid concentration was above 3% while the unit was in operation.
7000-15 EQT86	2, 4	Oxygen in the flue gas – 2% (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the oxygen concentration shows the oxygen concentration was within permit limits while the unit was in operation.
7000-15 EQT86	2	Dynawave scrubber effluent/feed ratio – 0.12 (minimum)	A review of the continuous monitoring records of the Dynawave scrubber effluent/feed ratio shows this ratio was within permit limits while the unit was in operation.
7000-15 EQT86	3	Vent Scrubber make up water – 300 lbs/hr (minimum one unit) 600 lbs/hr (minimum two units)	A review of the continuous monitoring records of the vent scrubber make up water shows the make up water was within permit limits while the unit was in operation.
7000-15 EQT86	4	The permittee shall test the automatic cut-off system monthly.	During the reporting period the automatic cut-off system was tested at least once per month.
7000-15 EQT86	5	The permittee shall shut down the HCl Unit if any of the following occur. Loss of combustion air Power outage Loss of instrument air Loss of cooling water High temperature in the primary Absorber	Systems and procedures are in place to comply with this requirement.
7000-15 EQT86	6	Combustion air flow shall be monitored continuously when the unit is in operation.	The combustion air flow was monitored continuously during this reporting period.

ATTACHMENT I (continued)
Semiannual Deviation Report
For the Period of July 1 to December 31, 2009

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
7000-15 EQT86	7	The permittee shall test metal concentration in the chlorinated hydrocarbon feed as specified by the LDEQ Hazardous Waste Division.	The Hazardous Waste regulations require yearly sampling of the waste feed for metals. The last test performed shows the metal concentration within the permit limits.
7000-15 EQT86	8	Particulate concentrations in the flue gas shall not exceed 0.04 grains/dscf at 7% oxygen by volume.	Stack test was performed as required under the Hazardous Waste Regulations; this source meets this emission limit.
7000-17 EQT87	1	Inspect the HCl Feed Tank's Scrubber to confirm scrubber is functioning properly.	Inspection of the HCl Feed Tank's scrubber is recorded in the Turnover Database, Monomer-HCl Log. On 12/15, the night shift did not check the scrubber. All other readings were taken during this reporting period.
2-74	1	Condenser water temperature of 55°F (12.8°C) – maximum (Monitoring requirement, once per shift)	A review of the continuous monitoring records of the condenser water temperature shows this unit operated within the permit limits during this reporting except for the following – 9/10 – 1 hour 37 minutes; 10/12 13 hours.
3-96 FUG3	1-12	The HCl Unit shall comply with the fugitive emissions regulations of 40CFR264, Subpart BB (hazardous waste) and 40CFR 63 Subpart H under the HON.	During the reporting period, fugitive emission monitoring was conducted as required by these regulations. Weekly visual inspections are recorded on form HCl-01. The records for the reporting period were audited, no records were found missing.

ATTACHMENT 3
2009 FIRST SEMIANNUAL REPORT
HCL RECOVERY UNIT
PERMIT 206-V0

DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

DuPont
Performance Elastomers

September 29, 2009

Dept. of Environmental Quality
Office of Environmental Compliance
Title V Program
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7006 2760 0005 3234 8122

Re: First 2009 Semiannual Monitoring Reports - AI # - 38806
Permit Nos. 3000-V2, 2249-V5, 206-V0

As required under the referenced permits DuPont Performance Elastomers L.L.C. is submitting the first 2009 semiannual monitoring reports for the following units:

Chloroprene Unit, Permit No. 3000-V2
Neoprene Unit, Permit No. 2249-V5
HCL Recovery Unit, Permit No. 206-V0

If you have any questions or need additional information you can contact me at (985) 536-5437 or at doris.b.grego@dupontelastomers.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

cc: Southeast Regional Office
CERTIFIED MAIL NO. 7006 2760 0005 3234 8139

ATTACHMENT 3
1H09 REPORT
HCL RECOVERY UNIT
PERMIT 206-V0

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Applicable Reporting Period: 01/01/09 (mm/dd/yy) to 06/30/09 (mm/dd/yy)

Company and Facility Identification					
Permit Number	206-V0	Parish	St. John the Baptist	Date Permit Issued	Jan. 12, 2005
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site, HCl Recovery Unit			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	David J. Pigion	Date	9/29/09
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Reporting		
Title V Permit Number: 206-V0 **Company Name:** Dupont Performance Elastomers L.L.C.		
Facility Name: Pontchartrain Site **AI Number:** 38806		
Question	**Response (Yes/No)**	**If the deviations have been previously reported, please reference below the report and date of the report.**
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	No	

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
1180-21 EQT-82	HCl	1	Inspect the HCl Product Tank's Scrubber at least once per shift to confirm the scrubber is functioning properly.	This scrubber is inspected once per shift.	Once per shift
1180-21.1, 21.2 and 21.3 EQTs-83, 84 and 85	HCl	1	Maintain product acid concentration above 3%. Perform product concentration tests at least once per shift.	Specific gravity tests are performed on the acid once per shift.	Once per shift
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	1	Hazardous waste combusted at this unit is limited to the following rates – 40MM lb/yr Onsite Chlorinated Organic; 20 MM lb/yr Offsite Chlorinated Organic; 8 MM lbs/yr Miscellaneous.	Monthly reports are issued on the amount of waste combusted in this unit.	Yearly
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2, 4, 6	Hazardous liquid feed rate for each burner – Max at 2500 lbs/hr; Total of 5000 lbs/hr. Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2, 4, 6	Combustion Chamber pressure -0.1 in. water (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring.	Continuous

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2, 4, 6	Combustion Chamber temperature 1800°F (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2, 4, 6	Dynawave scrubber – pH – 2.0 (min) Dynawave scrubber differential pressure 10 in. water (minimum Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2	ORP – 50 millivolts (minimum) If ORP values drop below minimum, the unit shall be taken off load until values are above minimum for 10 minutes.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2,4	Carbon Monoxide concentration – one hour rolling average corrected to 7% oxygen – 100 ppm (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2	Halide content of waste feed – 20 wt % (minimum) 60 wt% (maximum)	Each waste batch is sampled before sending it to the Feed Tanks.	Not specified

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2	Acid concentration of product – 3% (minimum)	Specific gravity tests are performed on the acid once per shift.	Not specified.
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2, 4	Oxygen in the flue gas – 2% (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring.	Not specified.
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	2	Dynawave scrubber effluent/feed ratio – 0.12 (minimum)	Continuous monitoring.	Not specified.
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	3	Vent Scrubber make up water – 300 lbs/hr (minimum one unit) 600 lbs/hr (minimum two units)	Continuous monitoring.	Not specified.
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	4	The permittee shall test the automatic cut-off system monthly.	Automatic cut-off system is tested as a minimum on a monthly basis.	Monthly
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	5	The permittee shall shut down the HCl Unit if any of the following occur. Loss of combustion air Power outage Loss of instrument air Loss of cooling water High temperature in the primary Absorber	Systems and procedures are in place to comply with this requirement.	As needed.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	6A	The permittee shall install, maintain and calibrate continuous CO and oxygen analyzers.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	6	Combustion air flow shall be monitored continuously when the unit is in operation.	Continuous monitoring.	Continuous
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	7	The permittee shall test metal concentration in the chlorinated hydrocarbon feed as specified by the LDEQ Hazardous Waste Division.	Waste feed stream is sampled once per year as required under the Hazardous Waste Regulations.	Yearly
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	8	Particulate concentrations in the flue gas shall not exceed 0.04 grains/dscf at 7% oxygen by volume.	Stack test was performed as required under the Hazardous Waste Regulations, this source meets this emission limit.	Not specified
7000-15 EQT86	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	9	The permittee shall comply with all applicable regulations of the LDEQ Hazardous Waste Division	This unit is inspected regularly by the LDEQ Hazardous Waste Division and it has been found in compliance with all regulations.	Continuous
7000-17 EQT87	Chloroprene, Toluene, Non Tox VOCs	1	Inspect the HCl Feed Tank's Scrubber to confirm scrubber is functioning properly.	Scrubber is inspected once per shift.	Once per shift
7000-17 EQT87	Chloroprene, Toluene, Non Tox VOCs	2, 3	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
7000-17.1 EQT88	Chloroprene, Toluene, Non Tox VOCs	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified
7000-17.2 EQT89	Chloroprene, Toluene, Non Tox VOCs	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified
2-74 EQT90	Chloroprene, Toluene, Non Tox VOCs, HCl	1	Condenser water temperature of 55°F (12.8°C) – maximum	Continuous monitoring.	Once per shift
2-74.1 EQT91	Chloroprene, Toluene, Non Tox VOCs, HCl	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified
2-74.2 EQT92	Chloroprene, Toluene, Non Tox VOCs, HCl	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified
2-74.3 EQT931	Chloroprene, Toluene, Non Tox VOCs, HCl	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified
2-74.4 EQT94	Chloroprene, Toluene, Non Tox VOCs, HCl	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified
2-74.5 EQT95	Chloroprene, Toluene, Non Tox VOCs, HCl	1, 2	Meet the requirements of HON Group 2 Tanks.	Only recordkeeping requirements in 63.123(a) are applicable.	Not specified

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
3-96 FUG3	Chloroprene, Toluene, Non Tox VOCs, HCl	1-12	The HCl Unit shall comply with the fugitive emissions regulations of 40CFR264, Subpart BB (hazardous waste) and 40CFR 63 Subpart H under the HON.	A fugitive emission program has been implemented at this unit which complies with both set of regulations. Semi-annual reports are sent to the LDEQ.	Monitoring as required (weekly, monthly and/or annual.)

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, HCl Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 206-V0 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, HCl Recovery Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			

ATTACHMENT I

Semiannual Deviation Report
For the Period of January 1 to June 30, 2009

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
1180-21 EQT-82	1	Inspect the HCl Product Tank's Scrubber at least once per shift to confirm the scrubber is functioning properly.	Inspections of the HCl Product Tank's Scrubber is documented in the Turnover Database, Monomer-Chlorine Services Log. All readings were taken during this reporting period.
1180-21.1, 21.2 and 21.3 EQTs-83, 84 and 85	1	Maintain product acid concentration above 3%. Perform product concentration tests at least once per shift.	Acid concentration is measured continuously while the unit is in operation. A review of the acid concentration readings for the reporting period shows the acid concentration was above 3% while the unit was in operation.
7000-15 EQT86	1	Hazardous waste combusted at this unit is limited to the following rates – 40MM lb/yr Onsite Chlorinated Organic; 20 MM lb/yr Offsite Chlorinated Organic; 8 MM lbs/yr Miscellaneous.	The total amount of waste combusted at this unit for 2008 was 11.5 MM pounds.
7000-15 EQT86	2, 4, 6	Hazardous liquid feed rate for each burner – Max at 2500 lbs/hr; Total of 5000 lbs/hr. Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the feed shows this unit operated within the permit limits for this reporting period.
7000-15 EQT86	2, 4, 6	Combustion Chamber pressure -0.1 in. water (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Combustion Chamber pressure shows this pressure was within permit limits while the unit was in operation.
7000-15 EQT86	2, 4, 6	Combustion Chamber temperature 1800°F (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Combustion Chamber temperature shows this temperature was within permit limits while the unit was in operation.
7000-15 EQT86	2, 4, 6	Dynawave scrubber – pH – 2.0 (min) Dynawave scrubber differential pressure 10 in. water (minimum Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Dynawave scrubber pH and differential pressure shows both parameters within permit limits while the unit was in operation.

ATTACHMENT I (continued)
Semiannual Deviation Report
For the Period of January 1 to June 30, 2009

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
7000-15 EQT86	2	ORP – 50 millivolts (minimum) If ORP values drop below minimum, the unit shall be taken off load until values are above minimum for 10 minutes.	A review of the continuous monitoring records of the Dynawave scrubber ORP shows the ORP was within permit limits while the unit was in operation.
7000-15 EQT86	2, 4	Carbon Monoxide concentration – one hour rolling average corrected to 7% oxygen – 100 ppm (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the CO_2 concentration shows the value was within permit limits while the unit was in operation.
7000-15 EQT86	2	Halide content of waste feed – 20 wt % (minimum) 60 wt% (maximum)	Tests performed on the waste feed, during this reporting period, show the halide content was within the permit limits.
7000-15 EQT86	2	Acid concentration of product – 3% (minimum)	A review of the acid concentration readings for the reporting reading show the acid concentration was above 3% while the unit was in operation.
7000-15 EQT86	2, 4	Oxygen in the flue gas – 2% (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the oxygen concentration shows the oxygen concentration was within permit limits while the unit was in operation.
7000-15 EQT86	2	Dynawave scrubber effluent/feed ratio – 0.12 (minimum)	A review of the continuous monitoring records of the Dynawave scrubber effluent/feed ratio shows this ratio was within permit limits while the unit was in operation.
7000-15 EQT86	3	Vent Scrubber make up water – 300 lbs/hr (minimum one unit) 600 lbs/hr (minimum two units)	A review of the continuous monitoring records of the vent scrubber make up water shows the make up water was within permit limits while the unit was in operation.
7000-15 EQT86	4	The permittee shall test the automatic cut-off system monthly.	During the reporting period the automatic cut-off system was tested at least once per month.
7000-15 EQT86	5	The permittee shall shut down the HCl Unit if any of the following occur. Loss of combustion air Power outage Loss of instrument air Loss of cooling water High temperature in the primary Absorber	Systems and procedures are in place to comply with this requirement.
7000-15 EQT86	6	Combustion air flow shall be monitored continuously when the unit is in operation.	The combustion air flow was monitored continuously during this reporting period.

ATTACHMENT I (continued)
Semiannual Deviation Report
For the Period of January 1 to June 30, 2009

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
7000-15 EQT86	7	The permittee shall test metal concentration in the chlorinated hydrocarbon feed as specified by the LDEQ Hazardous Waste Division.	The Hazardous Waste regulations require yearly sampling of the waste feed for metals. The last test performed shows the metal concentration within the permit limits.
7000-15 EQT86	8	Particulate concentrations in the flue gas shall not exceed 0.04 grains/dscf at 7% oxygen by volume.	Stack test was performed as required under the Hazardous Waste Regulations; this source meets this emission limit.
7000-17 EQT87	1	Inspect the HCl Feed Tank's Scrubber to confirm scrubber is functioning properly.	Inspection of the HCl Feed Tank's scrubber is recorded in the Turnover Database, Monomer-HCl Log. All readings were taken during this reporting period.
2-74	1	Condenser water temperature of 55°F (12.8°C) – maximum (Monitoring requirement, once per shift)	A review of the continuous monitoring records of the condenser water temperature shows this unit operated within the permit limits during this reporting except for the approximately 2 hours on 4/28/09 when the temperature was above the permit limit. The average temperature for that day was 5.1°C, which is below the permit limit.
3-96 FUG3	1-12	The HCl Unit shall comply with the fugitive emissions regulations of 40CFR264, Subpart BB (hazardous waste) and 40CFR 63 Subpart H under the HON.	During the reporting period, fugitive emission monitoring was conducted as required by these regulations. Weekly visual inspections are recorded on form HCl-01. The records for the reporting period were audited, no records were found missing.

A1/41/00 L804 V10 1100253294 91

DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

RECEIVE
MAR 26 2010
Air/Toxics & Inspection Coordination Branch
6EN-A

DuPont
Performance Elastomers

March 23, 2010

Dept. of Environmental Quality
Office of Environmental Compliance
Title V Program
P. O. Box 4312
Baton Rouge, LA 721-4312

CERTIFIED MAIL NO. 7008 1140 0001 6087 4386

Re: 2009 - Second Semiannual Report and Annual Certification for Permit No. 3000-V2, AI # - 38806, Chloroprene Unit

As required under the referenced permit (Part 70 General Condition R.3 and Louisiana Air Emission Permit, General Condition No. XI.C), DuPont Performance Elastomers L.L.C. is submitting the 2009 second semiannual report for the Chloroprene Unit. Also included, as required under 40 CFR 70.6(c)(5)(iv), is the 2009 Annual Certification of Compliance for this unit. A line by line certification statement is available at our site for review.

If you have any questions or need additional information you can contact me at (985) 536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

cc: Mr. Steve Thompson
Air Enforcement Section (6EN-AA)
1445 Ross Avenue
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7008 1140 0001 6087 4409

RECEIVE
MAR 26 2010
Air/Toxics & Inspection
Coordination Branch
SEN-A

ATTACHMENT 1
2009 ANNUAL COMPLIANCE CERTIFICATION
CHLOROPRENE UNIT
PERMIT 3000-V2

Louisiana DEQ Title V Annual Compliance Certification Form
DuPont Performance Elastomers, Chloroprene Unit

(Certification Part 1)

Applicable Reporting Period: 01/01/09 (mm/dd/yy) to 12/31/09 (mm/dd/yy)

Company and Facility Identification					
Permit Number	3000-V2	Parish	St. John the Baptist	Date Permit Issued	Dec. 19, 2003
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	David J. Pigion	Date	3/23/2010
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting		
Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.		
Facility Name: Pontchartrain Site **AI Number:** 38806		
Question	**Response (Yes/No)**	**If the deviations have been previously reported, please reference below the report and date of the report.**
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	Yes	Attached are copies of the two 2009 semiannual reports. All deviations were included with these reports

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

A line by line certification statement is available at our site for review.

ATTACHMENT 2
2009 SECOND SEMIANNUAL REPORT
CHLOROPRENE UNIT
PERMIT 3000-V2

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Applicable Reporting Period: 07/01/09 (mm/dd/yy) to 12/31/09 (mm/dd/yy)

Company and Facility Identification					
Permit Number	3000-V2	Parish	St. John the Baptist	Date Permit Issued	Dec. 19, 2003
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	David J. Pigion	Date	3/23/2010
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Reporting		
Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.		
Facility Name: Pontchartrain Site **AI Number:** 38806		
Question	**Response (Yes/No)**	**If the deviations have been previously reported, please reference below the report and date of the report.**
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	Yes	

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT046 (1117-1 DCB Storage Tanks Vent)	Toluene Chloroprene Non-tox VOCs	94 And State Only Spec. Condition # 2	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Continuous temperature monitored. Inspect brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift.
EQT013 (1110-2A DCB Storage Tanks Vent - 1031 Area)	Chloroprene, Non-tox VOCs	51 And State Only Spec. Condition # 2	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Continuous temperature monitored. Inspect brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift.
EQT017 (1110-3 Isom Reactor Vent – North)	Toluene Chloroprene Non-tox VOCs	57 And State Only Spec. Condition # 2	Maintain cooling media temperature at 0°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Monitor and record temperatures once per shift. Inspect brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT017 (1110-3 Isom Reactor Vent – South)	Toluene Chloroprene Non-tox VOCs	57 And State Only Spec. Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Monitor and record temperatures once per shift. Inspect brine lines once and pump pressure per shift.	Monitor and record temp. and brine lines once per shift.
HCl Scrubber	HCl	58, 59	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	Scrubbers are inspected once per shift.	Inspect and confirm scrubbers are working, once per shift.
EQT026 (1110-4 CD Vent Condenser)	Toluene Chloroprene Non-tox VOCs	82 And State Only Spec. Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the brine pump outlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Continuous temperature monitored. Inspect brine lines and pump pressure once per shift.	Monitor and record temp. and brine lines once per shift.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT026 (1110-4 CD Vent Condenser)	Toluene Chloroprene Non-tox VOCs	84 And Part 70 Spec. Condition # 2	40 CFR 63.100, 113(a)(3) and 113(d) Group 2 process vent with TRE between 1 and 4. Maintain average daily cooling media temperature at 10°C or below.	Continuous temperature monitored.	Daily average cooling media temperature.
EQT059 (1140-20 Aqueous Storage Vent Condenser)	Toluene Chloroprene Non-tox VOCs	110 And State Only Spec. Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Monitor and record temperatures once per shift. Inspect brine lines and pump pressure once per shift.	Monitor and record temp. and brine lines once per shift.
EQT006 (1110-2 HCl Scrubber @ Refining Jets Vent)	HCl	5, 6	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	Scrubbers are inspected once per shift.	Inspect and confirm scrubbers are working, once per shift.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT067 (7000-10A Monomer Flare)	Butadiene	143, 149, 150, 151	Opacity <20%, no visible emissions Flame present at all times and monitored continuously	Once a shift the flare stack is inspected for smoke or other visible emissions The flare is equipped with a thermostat, the temperature is tracked continuously. An alarm will sound in the control room when the temperature goes below set limit.	Visual inspections Monitor temperature continuously
FUG001 (3-91 Fugitive Emissions)	Chloroprene, Toluene, Butadiene	258-276, 387 278-366	This unit will comply with the applicable requirements of LAC 33:III.2121 This unit will comply with the applicable requirements of 40 CFR 63, Subpart H.	Components in organic service are monitored as required under LAC 33:III.2121 and 40 CFR 63, Subpart H. Reports are submitted to the State and EPA, and records are maintained on site for a period of three years.	Monitoring of components as stated on the referenced regulations.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
GRP005		369 429	Prepare and maintain Housekeeping Plan Prepare and maintain Emergency Episode Plan	Housekeeping and Emergency Episodes plan have been developed and are available for review.	

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
1117-1 1110-2A 1110-3 1140-20	8/15	7:08 pm	8/15	8:41 pm	1 hr 33 min	Brine pump pressure lower than permit limit due to the installation of a smaller pump. See Note 1, page 12.	Checked to verify there was brine flowing through the condensers.
	9/9	8:02 pm	9/9	10:46 pm	2 hrs 44 min		
	9/24	7:39 am	9/27	6:45 pm	10 hrs 40 min	Note – not continuously, small period of times during these three days.	
	10/21	6:31 am	10/21	9:13 pm	14 hrs 42 min		
	10/22	6:29 am	10/22	4:21 pm	10 hrs		
	10/23	1:28 pm	10/23	4:26 pm	3 hrs		
	11/13	4:50 pm	11/20	12:54 pm	30 hrs	Note – not continuously, small period of times during these 7 days.	
	12/13	4:33 pm	12/13	6:49 pm	2 hrs 16 min		
	12/14	3:49 am	12/14	5:01 am	1 hr 11 min		
	12/14	36:46 am	12/14	7:47 am	1 hr		

ATTACHMENT I

Semiannual Deviation Report
For the Period of July 1 to December 31, 2009

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT046 (1117-1 DCB Storage Tanks Vent)	94 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The cooling media for this source is required to be monitored at the exit of the refrigeration machines. No exceedances on the cooling media temperature were experienced during this reporting period while the unit was in operation. Brine lines are monitored once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation except as indicated on Note 1.
EQT013 (1110-2A DCB Storage Tank Vent - 1031 Area)	51 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The cooling media for this source is required to be monitored at the exit of the refrigeration machines. No exceedances on the cooling media temperature were experienced while the unit was in operation. Brine lines are monitored once per shift and readings are recorded in the Turnover Database, Monomer-Chlorine Services Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation except as indicated on Note 1.

ATTACHMENT I (continued)

Semiannual Deviation Report
For the Period of July 1 to December 31, 2009

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT017 (1110-3 Isom Reactor Vent – North)	57 And State Only Specific Condition # 2	Maintain cooling media temperature at 0°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Readings of the cooling media temperature and brine flow are taken once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation except as indicated on Note 1.
EQT017 (1110-3 Isom Reactor Vent – South)	57 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Readings of the cooling media temperature, brine flow and discharge pressure are taken once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.
EQT017 (1110-3 HCl Scrubber)	58, 59	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	This scrubber is inspected once a shift and readings recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.

ATTACHMENT I (continued)

Semiannual Deviation Report
For the Period of July 1 to December 31, 2009

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT026 (1110-4 CD Vent Condenser)	82 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the brine pump outlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	No exceedances on the cooling media temperature were experienced during this reporting period while the unit was in operation. Observations of the brine flow are taken once per shift and documented in the Turnover Database, Monomer-CD Synthesis Log. All readings were taken during this reporting period.
	84 And Part 70. Spec. Condition #2	40 CFR 63.100, 113(a)(3) and 113(d) Group 2 process vent with TRE between 1 and 4. Maintain cooling media temperature at 10°C or below.	The cooling media for this condenser was maintained below 10°C during this reporting period while the unit was in operation.
EQT059 (1140-20 Aqueous Storage Vent Condenser)	110 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the brine pump outlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The temperature of the cooling media was within the permit limits during this reporting period. [Maintenance activities allowed under Condition XVII were conducted during this reporting period. Total hours for 2009 were less than 85, Condition XVII allows for 100 hours.] Readings of the brine are taken once per shift and readings are recorded in the Turnover Database, Monomer-Brine Services Log. All readings were taken during this reporting period. Reading taken on 8/8, day shift, indicates there was excess venting coming from this vent. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation except as indicated on Note 1.
EQT006 (1110-2 HCl Scrubber @ Refining Jets Vent)	5, 6	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	This scrubber is inspected once a shift and readings recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.

ATTACHMENT I (continued)

Semiannual Deviation Report
For the Period of July 1 to December 31, 2009

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT067 (7000-10A Monomer Flare)	143, 149, 150, 151	Opacity <20%, no visible emissions Flame present at all times and monitored continuously	Flare visual readings are taken once per shift and recorded in the Turnover Database, Monomer-HCl Log. All readings were taken during this reporting period. The flare is equipped with a thermostat and the temperature of the flare is monitored continuously. During this reporting period the flare was down for maintenance while the units were down. See Note 2.
FUG001 (3-91 Fugitive Emissions)	258-276, 387 278-366	This unit will comply with the applicable requirements of LAC 33:III.2121 This unit will comply with the applicable requirements of 40 CFR 63, Subpart H.	Fugitive emissions monitoring is performed as required under these regulations.

Notes:

1. Cooling brine is used as the cooling media on most of the condensers at the Chloroprene Unit. The brine pumps on the condensers have maximum and minimum pressure limits to demonstrate brine is flowing through the condensers. The pressure limits are 165 and 65 psig, and readings are required to be taken once per shift. The same pump provides brine to four sources [1117-1, 1110-2A, 1110-3 and 1140-20].

   In 2009 one of the brine pumps was replaced with a smaller pump, since then the exit pressure of the system is sometimes lower than 65 psig. A permit modification was requested and approved on January 4, 2010 to change the lower pressure limit to 45 psig. As explained on the modification request, a pressure lower than 65 psig does not indicate the absence of brine flow which is the purpose of this permit requirement. Even though pressure readings are required to be taken once per shift, the pressures are recorded continuously, and DuPont Performance Elastomers is reporting all the periods when the pressure was below the lower limit on the Deviation Report. All pressure readings included in the Deviation Report were above 45 psig, new permit limit.

2. During the following period the flare was down for maintenance while the units were down.
   a. From 10/14/09 @ 04:48 until 10/15/09 @ 22:16 – 41 hours and 38 minutes.

ATTACHMENT 3
2009 FIRST SEMIANNUAL REPORT
CHLOROPRENE UNIT
PERMIT 3000-V2

DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

DuPont
Performance Elastomers

September 29, 2009

Dept. of Environmental Quality
Office of Environmental Compliance
Title V Program
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7006 2760 0005 3234 8122

Re: First 2009 Semiannual Monitoring Reports - AI # - 38806
Permit Nos. 3000-V2, 2249-V5, 206-V0

As required under the referenced permits DuPont Performance Elastomers L.L.C. is submitting the first 2009 semiannual monitoring reports for the following units:

Chloroprene Unit, Permit No. 3000-V2
Neoprene Unit, Permit No. 2249-V5
HCL Recovery Unit, Permit No. 206-V0

If you have any questions or need additional information you can contact me at (985) 536-5437 or at doris.b.grego@dupontelastomers.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

cc: Southeast Regional Office
CERTIFIED MAIL NO. 7006 2760 0005 3234 8139

ATTACHMENT 1
1H09 REPORT
CHLOROPRENE UNIT
PERMIT 3000-V2

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Applicable Reporting Period: 01/01/09 (mm/dd/yy) to 06/30/09 (mm/dd/yy)

Company and Facility Identification					
Permit Number	3000-V2	Parish	St. John the Baptist	Date Permit Issued	Dec. 19, 2003
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	David J. Pigion	Date	9/29/09
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Reporting		
Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.		
Facility Name: Pontchartrain Site **AI Number:** 38806		
Question	**Response (Yes/No)**	**If the deviations have been previously reported, please reference below the report and date of the report.**
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	No	

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT046 (1117-1 DCB Storage Tanks Vent)	Toluene Chloroprene Non-tox VOCs	94 And State Only Spec. Condition # 2	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Continuous temperature monitored. Inspect brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift.
EQT013 (1110-2A DCB Storage Tanks Vent - 1031 Area)	Chloroprene, Non-tox VOCs	51 And State Only Spec. Condition # 2	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Continuous temperature monitored. Inspect brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift.
EQT017 (1110-3 Isom Reactor Vent – North)	Toluene Chloroprene Non-tox VOCs	57 And State Only Spec. Condition # 2	Maintain cooling media temperature at 0°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Monitor and record temperatures once per shift. Inspect brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT017 (1110-3 Isom Reactor Vent – South)	Toluene Chloroprene Non-tox VOCs	57 And State Only Spec. Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Monitor and record temperatures once per shift. Inspect brine lines once and pump pressure per shift.	Monitor and record temp. and brine lines once per shift.
HCl Scrubber	HCl	58, 59	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	Scrubbers are inspected once per shift.	Inspect and confirm scrubbers are working, once per shift.
EQT026 (1110-4 CD Vent Condenser)	Toluene Chloroprene Non-tox VOCs	82 And State Only Spec. Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the brine pump outlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Continuous temperature monitored. Inspect brine lines and pump pressure once per shift.	Monitor and record temp. and brine lines once per shift.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT026 (1110-4 CD Vent Condenser)	Toluene Chloroprene Non-tox VOCs	84 And Part 70 Spec. Condition # 2	40 CFR 63.100, 113(a)(3) and 113(d) Group 2 process vent with TRE between 1 and 4. Maintain average daily cooling media temperature at 10°C or below.	Continuous temperature monitored.	Daily average cooling media temperature.
EQT059 (1140-20 Aqueous Storage Vent Condenser)	Toluene Chloroprene Non-tox VOCs	110 And State Only Spec. Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Monitor and record temperatures once per shift. Inspect brine lines and pump pressure once per shift.	Monitor and record temp. and brine lines once per shift.
EQT006 (1110-2 HCl Scrubber @ Refining Jets Vent)	HCl	5, 6	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	Scrubbers are inspected once per shift.	Inspect and confirm scrubbers are working, once per shift.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT067 (7000-10A Monomer Flare)	Butadiene	143, 149, 150, 151	Opacity <20%, no visible emissions Flame present at all times and monitored continuously	Once a shift the flare stack is inspected for smoke or other visible emissions The flare is equipped with a thermostat, the temperature is tracked continuously. An alarm will sound in the control room when the temperature goes below set limit.	Visual inspections Monitor temperature continuously
FUG001 (3-91 Fugitive Emissions)	Chloroprene, Toluene, Butadiene	258-276, 387 278-366	This unit will comply with the applicable requirements of LAC 33:III.2121 This unit will comply with the applicable requirements of 40 CFR 63, Subpart H.	Components in organic service are monitored as required under LAC 33:III.2121 and 40 CFR 63, Subpart H. Reports are submitted to the State and EPA, and records are maintained on site for a period of three years.	Monitoring of components as stated on the referenced regulations.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
GRP005		369 429	Prepare and maintain Housekeeping Plan Prepare and maintain Emergency Episode Plan	Housekeeping and Emergency Episodes plan have been developed and are available for review.	

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Chloroprene Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 3000-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			

ATTACHMENT I

Semiannual Deviation Report
For the Period of January 1 to June 30, 2009

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT046 (1117-1 DCB Storage Tanks Vent)	94 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The cooling media for this source is required to be monitored at the exit of the refrigeration machines. No exceedances on the cooling media temperature were experienced during this reporting period while the unit was in operation. Brine lines are monitored once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation except as indicated on Notes 1 and 2.
EQT013 (1110-2A DCB Storage Tank Vent - 1031 Area)	51 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The cooling media for this source is required to be monitored at the exit of the refrigeration machines. No exceedances on the cooling media temperature were experienced while the unit was in operation. Brine lines are monitored once per shift and readings are recorded in the Turnover Database, Monomer-Chlorine Services Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation except as indicated on Notes 1 and 2.

ATTACHMENT I (continued)

Semiannual Deviation Report
For the Period of January 1 to June 30, 2009

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT017 (1110-3 Isom Reactor Vent – North)	57 And State Only Specific Condition # 2	Maintain cooling media temperature at 0°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Readings of the cooling media temperature and brine flow are taken once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation except as indicated on Notes 1 and 2.
EQT017 (1110-3 Isom Reactor Vent – South)	57 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Readings of the cooling media temperature, brine flow and discharge pressure are taken once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.
EQT017 (1110-3 HCl Scrubber)	58, 59	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	This scrubber is inspected once a shift and readings recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.

ATTACHMENT I (continued)

Semiannual Deviation Report
For the Period of January 1 to June 30, 2009

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT026 (1110-4 CD Vent Condenser)	82 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the brine pump outlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	No exceedances on the cooling media temperature were experienced during this reporting period while the unit was in operation. On 6/11/09 for approximately 2.5 hours the cooling media temperature was between 5 and 10°C. The average daily temperature for this day was 2.17°C, below the permit limit. Observations of the brine flow are taken once per shift and documented in the Turnover Database, Monomer-CD Synthesis Log. All readings were taken during this reporting period.
	84 And Part 70. Spec. Condition #2	40 CFR 63.100, 113(a)(3) and 113(d) Group 2 process vent with TRE between 1 and 4. Maintain cooling media temperature at 10°C or below.	The cooling media for this condenser was maintained below 10°C during this reporting period while the unit was in operation.
EQT059 (1140-20 Aqueous Storage Vent Condenser)	110 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the brine pump outlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The temperature of the cooling media was within the permit limits during this reporting period. [On 3/27/09 the temperature of the cooling media was above the permit limit due to maintenance. This activity is covered under General Condition XVII.] Readings of the brine are taken once per shift and readings are recorded in the Turnover Database, Monomer-Brine Services Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation except as indicated on Notes 1 and 2.
EQT006 (1110-2 HCl Scrubber @ Refining Jets Vent)	5, 6	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	This scrubber is inspected once a shift and readings recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.

ATTACHMENT I (continued)

Semiannual Deviation Report
For the Period of January 1 to June 30, 2009

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT067 (7000-10A Monomer Flare)	143, 149, 150, 151	Opacity <20%, no visible emissions Flame present at all times and monitored continuously	Flare visual readings are taken once per shift and recorded in the Turnover Database, Monomer-HCl Log. All readings were taken during this reporting period. Reading on 4/21, days, indicates there were visible emissions from the flare. The flare is equipped with a thermostat and the temperature of the flare is monitored continuously. During this reporting period the flare was down for maintenance while the units were down. See Note 3.
FUG001 (3-91 Fugitive Emissions)	258-276, 387 278-366	This unit will comply with the applicable requirements of LAC 33:III.2121 This unit will comply with the applicable requirements of 40 CFR 63, Subpart H.	Fugitive emissions monitoring is performed as required under these regulations.

Notes:

1. During a period of 6 hours and 30 minutes (between 1/5/09 at 1:26 pm and 1/6/09 at 1:34 pm), the pressure on the refrigeration machines pumps was below the permit limit. The average pressure for each day was between the permit limits.
2. From 6/11/09 at 1:22 pm and 6/13/09 at 10:30 am, the pressure on the refrigeration machines pumps was below the permit limits. The temperature on the condensers' cooling media was within the permit limits.
3. During the following periods the flare was down for maintenance while the units were down.
    a. 1/21/09 from 4:48 pm to 8:09 pm
    b. 3/25/09 from 5:12 am to 3/26/09 at 4:28 pm
    c. 4/15/09 from 0:28 am until 4:48 pm

L804 v10

AI/A100 110025329491

DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

RECEIVE
MAR 26 2010
Air/Toxics & Inspection Coordination Branch
6EN-A

DuPont
Performance Elastomers

March 23, 2010

Dept. of Environmental Quality
Office of Environmental Compliance
Title V Program
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7008 1140 0001 6087 4393

Re: 2009 - Second Semiannual Report and Annual Certification for Permit No. 2249-V6, AI # - 38806, Neoprene Unit

As required under the referenced permit (Part 70 General Condition R.3 and Louisiana Air Emission Permit, General Condition No. XI.C), DuPont Performance Elastomers L.L.C. is submitting the 2009 second semiannual report for the Neoprene Unit. Also included, as required under 40 CFR 70.6(c)(5)(iv), is the 2009 Annual Certification of Compliance for this unit. A line by line certification statement is available at our site for review.

If you have any questions or need additional information you can contact me at (985) 536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

cc: Mr. Steve Thompson
Air Enforcement Section (6EN-AA)
1445 Ross Avenue
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7008 1140 0001 6087 4409

ATTACHMENT 1
2009 ANNUAL COMPLIANCE CERTIFICATION
NEOPRENE UNIT
PERMIT 2249-V6

Louisiana DEQ Title V Annual Compliance Certification Form
DuPont Performance Elastomers, Neoprene Unit
(Certification Part 1)

Applicable Reporting Period: 01/01/09 (mm/dd/yy) to 12/31/09 (mm/dd/yy)

Company and Facility Identification					
Permit Number	2249-V6	Parish	St. John the Baptist	Date Permit Issued	June 16, 2009
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	David J. Pigion	Date	3/23/2010
Responsible Official Title	Plant Manger		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting		
Title V Permit Number: 2249-V6 **Company Name:** DuPont Performance Elastomers L.L.C.		
Facility Name: Pontchartrain Site **AI Number:** 38806		
Question	**Response (Yes/No)**	**If the deviations have been previously reported, please reference below the report and date of the report.**
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	Yes	Attached are copies of the two 2009 semiannual reports. All deviations were included with these reports

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

A line by line certification statement is available at our site for review.

RECEIVE
MAR 2 6 2010
Air/Toxics & Inspection
Coordination Branch
8EN-A

ATTACHMENT 2
2009 SECOND SEMIANNUAL REPORT
NEOPRENE UNIT
PERMIT 2249-V6

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Applicable Reporting Period: 07/01/09 (mm/dd/yy) to 12/31/09 (mm/dd/yy)

Company and Facility Identification					
Permit Number	2249-V6	Parish	St. John the Baptist	Date Permit Issued	June 16, 2009
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	David J. Pigion	Date	3/23/2010
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Deviation Reporting		
Title V Permit Number: 2249-V6 **Company Name:** DuPont Performance Elastomers L.L.C.		
Facility Name: Pontchartrain Site **AI Number:** 38806		
Question	**Response (Yes/No)**	**If the deviations have been previously reported, please reference below the report and date of the report.**
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	No	

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 2249-V6 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
GRP0012 (EQT139 and 140) 1700-20 & 20A Refining Column	Toluene Chloroprene	124-137	40 CFR 63.485 - Maintain TRE > 1. Maintain a removal efficiency of 95% or greater	Daily average temperature of the cooling media (at the receiver) is maintained at or below 10°C.	Monitor and record temp. daily.
RLP0014 1700-2 Strippers Condenser Vent	Toluene Chloroprene Ammonia	141-153	40 CFR 63.485 - Maintain TRE > 1. Maintain a removal efficiency of 95% or greater	Water Condenser – Maintain daily average cooling media temperature at 50°C or below.	Monitor and record temp. daily of the cooling water loop.
				CD Condenser - Maintain daily average cooling media temperature at 5°C or below.	Monitor and record temp. daily.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 2249-V6 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
RLP0014 1700-2 Strippers Condenser Vent (Continued)	Toluene Chloroprene	141-153	40 CFR 63.485 - Maintain TRE > 1. Maintain a removal efficiency of 95% or greater	Common Condenser - Maintain daily average cooling media temperature at -15°C or below measured at the condenser brine inlet.	Monitor and record temp. daily.
RLP0015 1700-3 Kettles Condenser	Toluene Chloroprene	154-164	Maintain Group 2 status. Condenser Brine Outlet temperature should be below 5C. Monitor valves on the brine lines.	Brine Condenser - Maintain daily average cooling media temperature at 5°C or below measured at the condenser brine outlet. Valves on brine lines are monitored once per shift	Monitor and record temp. daily. Monitor valves once per shift.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 2249-V6 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
FUG0004 (3-91 Fugitive Emissions)	Toluene Chloroprene	95-99	Comply with the applicable requirements of LAC 33:III.2121 Comply with the applicable requirements of 40 CFR 63.502	Components in organic service are monitored as required under LAC 33:III.2121 and 40 CFR 63.502. Reports are submitted to the State and EPA, and records are maintained on site for a period of three years.	Monitoring of components as stated on the referenced regulations.
UNF0001 Facility Wide		212	LAC 33:III.2113.A Prepare and maintain Housekeeping Plan	Housekeeping Plan has been developed and is available for review.	Monitor and record temp. daily.
		230-233 183-204	LAC 33:III.5609.A Prepare and maintain Emergency Episode Plan Comply with the requirements of RMP - 40 CFR 68	Emergency Episode Plan has been developed and is available for review. This facility has submitted all the information required under 40 CFR 63	Monitor and record temp. daily. Records kept on site

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 2249-V6 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			

ATTACHMENT I

Semiannual Deviation Report
For the Period of July 1 to December 31, 2009

Neoprene Unit - Monitoring Requirements

Source Number	Permit Condition	Compliance Method	Status of Compliance
EQT139 and 140 1700-20 & 20A Refining Column		Maintain daily average temperature of the cooling media (at the receiver) at or below 10°C.	The temperature of the brine at the receiver is monitored through our computer data system. All data for this reporting period was reviewed and no exceedances were found, while the Refining Column was in operation.
1700-2A No. 1 Stripper		Water Condenser – Maintain daily average cooling media temperature at 50°C or below. (Sampling point is at the cooling water loop - 17361053tt.) Inspect cooling media lines once per shift. CD Condenser - Maintain daily average cooling media temperature at 5°C or below. (Sampling point is at the cooling brine loop -17361058tt.) Inspect cooling media lines once per shift.	The temperatures of the Cooling Water and the Cooling Brine Loops are kept in our computer data system. All data for this reporting period was reviewed and no exceedances were found, while the strippers were in operation. The cooling media lines are inspected once per shift and observations recorded in the Turnover Database. All readings were taken during this reporting period.
1700-2B No. 2 Stripper		Water Condenser – Maintain daily average cooling media temperature at 50°C or below. (Sampling point is at the cooling water loop - 17361053tt.) Inspect cooling media lines once per shift. CD Condenser - Maintain daily average cooling media temperature at 5°C or below. (Sampling point is at the cooling brine loop -17361058tt.) Inspect cooling media lines once per shift.	The temperatures of the Cooling Water and the Cooling Brine Loops are kept in our computer data system. All data for this reporting period was reviewed and no exceedances were found, while the strippers were in operation. The cooling media lines are inspected once per shift and observations recorded in the Turnover Database. All readings were taken during this reporting period.

ATTACHMENT I (continued)

Semiannual Deviation Report
For the Period of July 1 to December 31, 2009

Neoprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
1700-2C No. 3 Stripper		Water Condenser – Maintain daily average cooling media temperature at 50°C or below. (Sampling point is at the cooling water loop - 17361053tt.) Inspect cooling media lines once per shift. CD Condenser - Maintain daily average cooling media temperature at 5°C or below. (Sampling point is at the cooling brine loop -17361058tt) Inspect cooling media lines once per shift.	The temperatures of the Cooling Water and the Cooling Brine Loops are kept in our computer data system. All data for this reporting period was reviewed and no exceedances were found, while the strippers were in operation. The cooling media lines are inspected once per shift and observations recorded in the Turnover Database. All readings were taken during this reporting period.
RLP0014 1700-2 Stripper's Common Vent Condenser		Brine Condenser - Maintain daily average cooling media temperature at -15°C or below. Sampling point is located at the condenser brine inlet, it is monitored at the brine supply header. (BRNSUPHDRTMP)	The temperature of the cooling brine is monitored thru our computer system. All data for this reporting period was reviewed and no exceedances were while the strippers were in operation.
RLP0015 1700-3 Kettles Condenser		Brine Condenser - Maintain daily average cooling media temperature at 5°C or below. Sampling point is located at the condenser brine outlet. (1736081tt) Inspect valves on the cooling media lines once per shift.	The temperature of the cooling brine is monitored thru our computer system. All data for this reporting period was reviewed and no exceedances were found while the kettles were in operation. The cooling media lines are inspected once per shift and observations recorded in the Turnover Database. All readings were taken during this reporting period.

ATTACHMENT 3
2009 FIRST SEMIANNUAL REPORT
NEOPRENE UNIT
PERMIT 2249-V6

DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

DuPont
Performance Elastomers

September 29, 2009

Dept. of Environmental Quality
Office of Environmental Compliance
Title V Program
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7006 2760 0005 3234 8122

Re: First 2009 Semiannual Monitoring Reports - AI # - 38806
Permit Nos. 3000-V2, 2249-V5, 206-V0

As required under the referenced permits DuPont Performance Elastomers L.L.C. is submitting the first 2009 semiannual monitoring reports for the following units:

Chloroprene Unit, Permit No. 3000-V2
Neoprene Unit, Permit No. 2249-V5
HCL Recovery Unit, Permit No. 206-V0

If you have any questions or need additional information you can contact me at (985) 536-5437 or at doris.b.grego@dupontelastomers.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

cc: Southeast Regional Office
CERTIFIED MAIL NO. 7006 2760 0005 3234 8139

ATTACHMENT 2
1H09 REPORT
NEOPRENE UNIT
PERMIT 2249-V5

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Applicable Reporting Period: 01/01/09 (mm/dd/yy) to 06/30/09 (mm/dd/yy)

Company and Facility Identification					
Permit Number	2249-V5	Parish	St. John the Baptist	Date Permit Issued	12/18/2008
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	David J. Pigion	Date	9/29/09
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Deviation Reporting		
Title V Permit Number: 2249-V5	**Company Name:** DuPont Performance Elastomers L.L.C.	
Facility Name: Pontchartrain Site	**AI Number:** 38806	
Question	**Response (Yes/No)**	**If the deviations have been previously reported, please reference below the report and date of the report.**
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	No	

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 2249-V5 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT139 and 140 1700-20 & 20A Refining Column	Toluene Chloroprene	1-28	40 CFR 63.485 - Maintain TRE > 1. (Conditions 6 thru 11, 13, 20 thru 25 and 27 are not applicable to these sources because the pollution control device used is a condenser.)	Daily average temperature of the cooling media (at the receiver) is maintained at or below 10°C.	Monitor and record temp. daily.
RLP0014 1700-2 Strippers Condenser Vent	Toluene Chloroprene Ammonia	140-152	40 CFR 63.485 - Maintain TRE > 1.	Water Condenser – Maintain daily average cooling media temperature at 50°C or below.	Monitor and record temp. daily of the cooling water loop.
				CD Condenser - Maintain daily average cooling media temperature at 5°C or below.	Monitor and record temp. daily.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 2249-V5 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
RLP0014 1700-2 Strippers Condenser Vent (Continued)	Toluene Chloroprene	140-152	40 CFR 63.485 - Maintain TRE > 1.	Brine Condenser - Maintain daily average cooling media temperature at -15°C or below measured at the condenser brine inlet.	Monitor and record temp. daily.
			(Conditions 145 thru 150 are not applicable to these sources because the pollution control device used is a condenser.)		
RLP0015 1700-3 Kettles Condenser	Toluene Chloroprene	153-156	Maintain Group 2 status. (Condition 155 is not applicable to these sources because the pollution control device used is a condenser.)	Brine Condenser - Maintain daily average cooling media temperature at 5°C or below measured at the condenser brine outlet.	Monitor and record temp. daily.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 2249-V5 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
FUG0004 (3-91 Fugitive Emissions)	Toluene Chloroprene	132-136	Comply with the applicable requirements of LAC 33:III.2121 Comply with the applicable requirements of 40 CFR 63.502	Components in organic service are monitored as required under LAC 33:III.2121 and 40 CFR 63.502. Reports are submitted to the State and EPA, and records are maintained on site for a period of three years.	Monitoring of components as stated on the referenced regulations.
UNF0001 Facility Wide		204	LAC 33:III.2113.A Prepare and maintain Housekeeping Plan	Housekeeping Plan has been developed and is available for review.	Monitor and record temp. daily.
		227	LAC 33:III.5609.A Prepare and maintain Emergency Episode Plan	Emergency Episode Plan has been developed and is available for review.	Monitor and record temp. daily.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont Performance Elastomers, Neoprene Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 2249-V5 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			

ATTACHMENT I

Semiannual Deviation Report
For the Period of January 1 to June 30, 2009

Neoprene Unit - Monitoring Requirements

Source Number	Permit Condition	Compliance Method	Status of Compliance
EQT139 and 140 1700-20 & 20A Refining Column		Maintain daily average temperature of the cooling media (at the receiver) at or below 10°C.	The temperature of the brine at the receiver is monitored through our computer data system. All data for this reporting period was reviewed and no exceedances were found, while the Refining Column was in operation.
1700-2A No. 1 Stripper		Water Condenser – Maintain daily average cooling media temperature at 50°C or below. (Sampling point is at the cooling water loop - 17361053tt.) Inspect cooling media lines once per shift. CD Condenser - Maintain daily average cooling media temperature at 5°C or below. (Sampling point is at the cooling brine loop -17361058tt.) Inspect cooling media lines once per shift.	The temperatures of the Cooling Water and the Cooling Brine Loops are kept in our computer data system. All data for this reporting period was reviewed and no exceedances were found, while the strippers were in operation. The cooling media lines are inspected once per shift and observations recorded in the Turnover Database. All readings were taken during this reporting period.
1700-2B No. 2 Stripper		Water Condenser – Maintain daily average cooling media temperature at 50°C or below. (Sampling point is at the cooling water loop - 17361053tt.) Inspect cooling media lines once per shift. CD Condenser - Maintain daily average cooling media temperature at 5°C or below. (Sampling point is at the cooling brine loop -17361058tt.) Inspect cooling media lines once per shift.	The temperatures of the Cooling Water and the Cooling Brine Loops are kept in our computer data system. All data for this reporting period was reviewed and no exceedances were found, while the strippers were in operation. The cooling media lines are inspected once per shift and observations recorded in the Turnover Database. All readings were taken during this reporting period.

ATTACHMENT I (continued)

Semiannual Deviation Report
For the Period of January 1 to June 30, 2009

Neoprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
1700-2C No. 3 Stripper		Water Condenser – Maintain daily average cooling media temperature at 50°C or below. (Sampling point is at the cooling water loop - 17361053tt.) Inspect cooling media lines once per shift. CD Condenser - Maintain daily average cooling media temperature at 5°C or below. (Sampling point is at the cooling brine loop -17361058tt) Inspect cooling media lines once per shift.	The temperatures of the Cooling Water and the Cooling Brine Loops are kept in our computer data system. All data for this reporting period was reviewed and no exceedances were found, while the strippers were in operation. The cooling media lines are inspected once per shift and observations recorded in the Turnover Database. All readings were taken during this reporting period.
RLP0014 1700-2 Stripper's Common Vent Condenser		Brine Condenser - Maintain daily average cooling media temperature at -15°C or below. Sampling point is located at the condenser brine inlet, it is monitored at the brine supply header. (BRNSUPHDRTMP)	The temperature of the cooling brine is monitored thru our computer system. All data for this reporting period was reviewed and no exceedances were while the strippers were in operation. [During 5/16/09 and 5/19/09 for short periods of time, totaling 3 hours and 22 minutes, the cooling media temperature was above the permit limit, but the daily average temperature was below -15°C.]
RLP0015 1700-3 Kettles Condenser		Brine Condenser - Maintain daily average cooling media temperature at 5°C or below. Sampling point is located at the condenser brine outlet. (1736081tt)	The temperature of the cooling brine is monitored thru our computer system. All data for this reporting period was reviewed and no exceedances were found while the kettles were in operation.

A1/A1/10

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L804
V10

DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

RECEIVE
APR 12 2010
Air/Toxics & Inspection
Coordination Branch
6EN-A

Certified Mail No. 7006 2760 0000 2201 4285

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

April 7, 2010

RE: SOCMI HON Subpart G Periodic Report
Period: Sep 19, 2009 - Mar 18, 2010
Facility: DuPont DCSE in LaPlace, LA

Enclosed is the SOCMI Hon Subpart G Periodic Report for DuPont's P-phenylenediamine (Diamines) Unit located in LaPlace, Louisiana. This report is required per 40 CFR 63.152 (c) and covers the compliance period of September 19, 2009 to March 18, 2010. This Periodic Report also includes a signed Startup, Shutdown, and Malfunction Certification as required per 40 CFR 63.10(d)(5)(i) of Subpart A

A copy of this report is also being sent to LDEQ. If you have any questions or need any additional information, please contact me at (985) 536-5798.

Sincerely,

Sarah Beth Warren

Sarah Beth Warren
Environmental Coordinator

Enclosures:

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

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APR 1 2 2010
Air/Toxics & Inspection
Coordination Branch
6EN-A

E. I. DU PONT DE NEMOURS & COMPANY, INC.
PONTCHARTRAIN SITE
LA PLACE, LOUISIANA
P-PHENYLENEDIAMINES (DIAMINES) UNIT

Semi-Annual Periodic Report for
September 19, 2009 through March 18, 2010

Per 40 CFR 63.152(c)(2), this Periodic Report includes all information specified in 63.117 and 63.118 for process vents, 63.122 for storage vessels, 63.129 for transfer operations, and 63.146 for process wastewater. This report covers the period from September 19, 2008 to March 18, 2009.

PROCESS VENTS

40 CFR 63.118(f):

The following Group 1 process vents are routed to the Flammable Vent Header Flare #1 (1500-34) and the Flammable Vent Header Flare #2 (1500-66): the High Boiler Column (1500-34I), the IPP Column (1500-34J), the Low Boiler Column (1500-34K), and the Refining Column (1500-34L).

(1) Daily average values outside ranges established in Notification of Compliance Status:

Not applicable. The Flammable Vent Header Flare#1, 1500-34 and the Flammable Vent Header Flare #2, 1500-66, are used to control all Group 1 process vent emissions. Per 40 CFR 63.118(a)(5), for flares, records of the time and duration of all periods during which the pilot flame is absent shall be kept rather than daily averages. The Primary Flare used is the Flammable Vent Header Flare #2 (1500-66), and the original Flammable Vent Header Flare (1500-34) is used as a backup.

(2) For Group 1 points, duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data:

There were no instances of insufficient reporting during this monitoring period. See Table 1 attached.

(3) Time and duration of all periods when the vent stream is diverted from the control device through a bypass line:

Exempt: Per 40 CFR 63.114(d), equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to this paragraph. The only existing bypass lines that could divert a vent stream away from the control device are there for safety purposes and are, therefore, exempt from this requirement.

(4) Periods in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line valve was checked out:

Exempt: See (3) above.

(5) Time and duration of all periods in which the pilot flame of the Flammable Vent Header Flare, 1500-34, and the Flammable Vent Header Flare #2, 1500-66 were absent:

There were no outages of the Flammable Vent Header Flare #1, 1500-34, and the Flammable Vent Header Flare #2, 1500-66, during this reporting period. See attached Table 2.

(6) Carbon bed regeneration cycles:

Not applicable. Carbon beds are not used as control devices for Group 1 process vents.

40 CFR 63.118(g),(h),(i),and (j):

There were no process changes made during this report period that caused a Group 2 process vent to become a Group 1 process vent, a Group 2 process vent with a TRE greater than 4.0 to become a Group 2 process vent with a TRE less than 4.0, a Group 2 process vent with a flow rate less than 0.005 scm per minute to become a Group 2 process vent with a flow rate of 0.005 scm per minute or greater with a TRE less than or equal to 4.0, or a Group 2 process vent with an organic HAP concentration less than 50 ppm to become a Group 2 process vent with an organic HAP concentration of 50 ppm or greater with a TRE less than or equal to 4.0. See Table 3, Process Changes Affecting Process Vent Classifications, attached.

STORAGE VESSELS

40 CFR 63.122(g):

Closed vent systems and control devices are used to control emissions from Group 1 storage vessels, the Crude Storage Tank (1500-8A) and the Hydrogenate Storage Tank (1500-38A). The control devices used to control emissions from these storage vessels are the Crude Storage Tank Scrubber (1500-8) and the Hydrogenate Storage Tank Scrubber (1500-38).

(1) Planned routine maintenance operations that would require the control device to not meet the 95% efficiency emission control requirements:

A description of the planned routine maintenance on the control devices which was performed during the previous six months is presented in Table 4. There were no maintenance outages during the monitoring period. Anticipated maintenance during the next six months is presented in attached Table 5.

(2) For control devices other than a flare, the occurrence when the monitored parameters were outside the parameter ranges documented in the Notification of Compliance Status:

There were no excursions during this monitoring period. See attached Table 6.

(3) For flares, the occurrence when the control device did not meet the general control device requirements per 63.11(b):

Not applicable. No flare is used to control emissions from any HON Group 1 storage vessel. (Note that Flammable Vent Header Flare #1, 1500-34 and the Flammable Vent Header Flare #2, 1500-66 are used to control emissions from a Benzene storage tank covered and reported under the Benzene NESHAP program).

TRANSFER OPERATIONS

40 CFR 63.130(d):

Periodic Report information shall be submitted for transfer racks subject to the requirements of 63.126:

Not applicable. Per 40 CFR 63.126(c), recordkeeping provisions are the only requirement for Group 2 transfer operations. All transfer operations sources are Group 2. No changes in design annual throughput, material loaded, or vapor pressure at transfer racks occurred during this reporting period.

PROCESS WASTEWATER

40 CFR 63.146(c),(d),(e),(f),(g):

Not applicable. All process wastewater sources are Group 2. No changes in average flowrate or average VOHAP concentration for wastewater streams occurred during this reporting period.

LEAK INSPECTIONS

40 CFR 63.148(k):

The closed vent systems subject to these provisions are also subject to 63.172 of subpart H; therefore, leak inspections are conducted according to requirements of 63.172.

E. I. DU PONT DE NEMOURS & COMPANY, INC.
PONTCHARTRAIN SITE
LA PLACE, LOUISIANA
P-PHENYLENEDIAMINES (DIAMINES) UNIT

COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
PERIODIC STARTUP, SHUTDOWN, MALFUNCTION
AND CERTIFICATION REPORT PER PARA 63.10(d)(5)(i)

Semi-Annual Periodic Certification for
September 19, 2009 through March 18, 2010

All actions taken by E. I. DuPont de Nemours & Co., Inc., located at the Pontchartrain Site, during startup, shutdown, or malfunction of any process or air pollution control device equipment were consistent with the procedures detailed in the Startup, Shutdown, and Malfunction Plan. This plan was compiled as required per 40 CFR 63.6(e)(3) for the Diamines Unit which produces p-phenylenediamine and is therefore subject to applicable requirements of SOCMI HON regulations. During the reporting of September 19, 2009 to March 18, 2010, all process equipment and air pollution control device equipment was operated in a manner consistent with good air pollution control practices for minimizing emissions to the levels required by all relevant SOCMI HON standards.

I certify that the procedures described in the Startup, Shutdown, and Malfunction Plan were followed:

Signature: Walter L. Glenn Date: 4-8-2010
Walter L. Glenn, Plant Manager

(If the procedures described in the Startup, Shutdown, and Malfunction Plan were not followed, prepare and attach a Startup, Shutdown, and Malfunction Plan Variance Report.)

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.118(f)(2)

TABLE 1
INSUFFICIENT MONITORING DATA FOR PROCESS VENT CONTROL DEVICES

Report Period
September 19, 2009 to March 18, 2010

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH	EQUIP. NO.	EQUIP. NAME	CAUSE OF MALFUNCTION
10/15/2009	11:00	10/15/2009	12:00	1.0	1500-66	FVH #2	Lost data historian for one hour during UPS migration.
10/15/2009	11:00	10/15/2009	12:00	1.0	1500-38	Hydrog Tank Scrubber	Lost data historian for one hour during UPS migration.
10/15/2009	11:00	10/15/2009	12:00	1.0	1500-8	Crude Tank Scrubber	Lost data historian for one hour during UPS migration.

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL
PER PARA 63.118(f)(5)

TABLE 2
FLAMMABLE VENT HEADER FLARE OUTAGES

Report Period
September 19, 2009 to March 18, 2010

DATE	TIME START	TIME STOP	TIME LENGTH HRS	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	COMMENTS
There were no outages of the Flammable Vent Header Flare during this monitoring period.							

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.118(g), (h), (i), (j)

TABLE 3
PROCESS CHANGES AFFECTING PROCESS VENT CLASSIFICATIONS

Report Period
September 19, 2009 to March 18, 2010

PROCESS VENT NO.	PROCESS VENT NAME	GROUP PRIOR TO PROCESS CHANGE	DESCRIPTION OF PROCESS CHANGE	RESULTS OF RECALCULATION	CONTROL DEVICE FOR COMPLIANCE*
There were no process changes affecting any process vents' HON status made during this reporting period.					

* If process changes were made which changed the classification of a process vent, a statement that the owner or operator will comply with all applicable provisions of 40 CFR 63.113 must also be provided with this report.

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.122(g)(1)

TABLE 4
PAST MAINTENANCE FOR CONTROL DEVICES

Report Period
September 19, 2009 to March 18, 2010

MAINTENANCE PERFORMED DURING THE PAST 6 MONTHS					
EQUIP. NO.	EQUIPMENT NAME	TYPE OF MAINTENANCE PERFORMED	FREQUENCY OF MAINTENANCE	DATE PERFORMED	TIME LENGTH
1500-8	Crude Tank Scrubber	No maintenance this period.	Periodic	-	0 hours
1500-8	Crude Tank Scrubber			Total	0 hours
1500-34	Flammable Vent Header Flare #1	No maintenance this period.	Annual	-	0 hours
1500-34	Flammable Vent Header Flare #1			Total	0 hours
1500-38	Hydrogenate Tank Scrubber	Conservation vent and tank vent inspection; relief valve testing.	Annual	10/3/2009 - 10/19/2009	319
1500-38	Hydrogenate Tank Scrubber			Total	319
1500-66	Flammable Vent Header Flare #2	Work on natural gas and nitrogen relief valves.	Annual	10/6/2009	59
1500-66	Flammable Vent Header Flare #2			Total	59

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.122(g)(1)

TABLE 5
PLANNED MAINTENANCE FOR CONTROL DEVICES

Report Period
September 19, 2009 to March 18, 2010

MAINTENANCE ANTICIPATED TO BE PERFORMED WITHIN THE NEXT 6 MONTHS				
EQUIP. NO.	EQUIPMENT NAME	TYPE OF MAINTENANCE	FREQUENCY OF MAINTENANCE	TIME LENGTH ESTIMATE
1500-8	Crude Tank Scrubber	Routine Yearly Maintenance	As needed	NA
1500-34	Flammable Vent Header Flare No. 1	Routine Yearly Maintenance	No maintenance is planned in the next six months.	NA
1500-38	Hydrogenate Tank Scrubber	Routine Yearly Maintenance	No maintenance is planned in the next six months.	NA
1500-66	Flammable Vent Header Flare No. 2	Routine Yearly Maintenance	No maintenance is planned in the next six months.	NA

*The Diamines Title V Permit (2090-V0) authorizes construction and operation of the Flammable Vent Header Flare No. 2 (1500-66) as the primary flare. The existing Flammable Vent Header Flare (1500-34) shall be used only when the primary flare is down.

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.122(g)(2)

TABLE 6: MONITORED PARAMETER EXCURSIONS FOR STORAGE VESSELS

Report Period
September 19, 2009 to March 18, 2010

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH hrs:min	EQUIP. NO.	EQUIP. NAME	CAUSE OF MALFUNCTION
					1500-38	Hydrog Tank	There were no excursions during this monitoring period.
					1500-8	Crude Tank	There were no excursions during this monitoring period.

AI/AI/CO

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DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

DuPont
Performance Elastomers

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APR 23 2010
Air/Toxics & Inspection
Coordination Branch
6EN-A

April 19, 2010

Mr. David Garcia
Compliance Assurance and Enforcement Division
Mail Number: 6-EN-A
US EPA Region 6
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733

CERTIFIED MAIL NO. 7008 1140 0001 6087 4454

Re: Fugitive Periodic Report – Chloroprene Unit

Dear Mr. Garcia:

As required under 40 CFR 63.182.d.1 DuPont Performance Elastomers, Pontchartrain Site, is submitting the Fugitive Periodic Report for the Chloroprene Unit located in LaPlace Louisiana. This report includes the reporting period of October 2009 thru March 2010. This facility belongs to the SOCMI - Group II category. All monitoring of fugitive emissions has been performed as required by 40 CFR 63.160.

We trust this information complies with the requirements of the referenced regulations. If you have any questions you can contact me at (985) 536-5437 or by email at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

cc: Dept. of Environmental Quality
Office of Compliance
P. O. Box 4312
Baton Rouge, La 70821-4312
CERTIFIED MAIL NO. 7008 1140 0001 6087 4461
AI# - 38806

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
SOCMI – GROUP II CATEGORY

RECEIVED
APR 23 2010
Air Toxics & Inspection Coordination Branch

PERIODIC REPORT FOR EQUIPMENT LEAKS
[40 CFR §63.182(d)(1)]
October 1, 2009 to March 31, 2010

1. NAME OF FACILITY: DuPont Performance Elastomers L.L.C.

PROCESS UNIT: Chloroprene Manufacturing Unit

2. SUMMARY INFORMATION [40 CFR §63.182 (d)(2)]		2009 OCT	NOV	DEC	2010 JAN	FEB	MAR
(i)	No. valves found leaking	-	-	0	0	-	0
	Percent valves leaking	-	-	0	0	-	0
	Total no. monitored	-	-	281	275	-	1965
(ii)	No. leaking valves not repaired	-	-	0	0	-	0
	No. valves not repairable	-	-	0	0	-	0
(iii)	No. pumps found leaking	0	0	0	0	0	0
	Percent leaking pumps	0	0	0	0	0	0
	Total no. monitored	73	73	73	73	71[1]	71[1]
(iv)	No. leaking pumps not repaired	0	0	0	0	0	0
(v)	No. compressors found leaking	0	0	0	0	0	0
(vi)	No. leaking compressors No repaired	0	0	0	0	0	0
(vii)	No. agitators found leaking	0	0	0	0	0	0
(viii)	No. leaking agitators not repaired	0	0	0	0	0	0
(ix)	No. leaking connectors	-	-	0	-	-	-
	Percent connectors leaking	-	-	0	-	-	-
	Total no. monitored	-	-	705	-	-	-

2. SUMMARY INFORMATION [40 CFR §63.182 (d)(2)]		2009 OCT	NOV	DEC	2010 JAN	FEB	MAR
(x)	Reserved						
(xi)	No. leaking connectors not repaired	-	-	0	-	-	-
	No. connectors not repairable	-	-	0	-	-	-
(xii)	Reserved						
(xiii)	Explain delay of repairs, if any, and why process unit shutdown was technically infeasible, if appropriate.						
(xiv)	Results of monitoring to comply with:						
	63.164 (i) – No leaks were detected when monitoring the compressors.						
	63.165 (a) – Pressure relief devices are monitored once a month to insure they operate below the 500 ppm limit.						
	63.172 (f) – Not applicable						
(xv)	Not applicable						
(xvi)	Connectors Monitoring Alternatives – Since the implementation of the fugitive emission program, this unit has used the monitoring alternative described under 63.174(c)(1)(ii).						
(xvii)	Not applicable						

Notes:

(1) Two pumps were out of service in February and March.

CHLOROPRENE UNIT
LEAK RATE

Quarter	Rate	Rolling Avg.
1Q06	0.23	0.46
2Q06	Skip Period	
3Q06	0.12	0.18
4Q06	Skip Period	
1Q07	0.08	0.10
2Q07	Skip Period	
3Q07	0.04	0.06
4Q07	Skip Period	
1Q08	0	0.02
2Q08	Skip Period	
3Q08	0	0.01
4Q08	Skip Period	
1Q09	0.043	0.026
2Q09	Skip Period	
3Q09	0.51	0.28
4Q09	Skip Period	
1Q10	0	0.26

Per 40 CFR 63.168 for process units with a rolling average of less than 0.5% leaking valves, the owner or operator may elect to monitor each valve once every 4 quarters.

A1/A1/10

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DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

L804 VID

DuPont Performance Elastomers

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APR 23 2010
AP/Toxics & Inspection Coordination Branch
6EN-A

April 19, 2010

Mr. David Garcia
Compliance Assurance and Enforcement Division
Mail Number: 6-EN-A
US EPA Region 6
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733

CERTIFIED MAIL NO. 7008 1140 0001 6087 4478

RE: HON Periodic Report – AI# - 38806

Dear Mr. Garcia:

As required under 40 CFR 63.152(c), DuPont Performance Elastomers L.L.C. is submitting the HON Periodic Report for the Chloroprene Unit, located in LaPlace, Louisiana. This report covers the compliance period of September 19, 2009 to March 18, 2010. Also included with this report is the Startup, Shutdown, and Malfunction Report required under 40 CFR 63.10(d)(5).

If you have any questions or need additional information, you can contact me at (985) 536-5437 or by email at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

cc: Dept. of Environmental Quality
Office of Compliance
P. O. Box 4312
Baton Rouge, La 70821-4312
CERTIFIED MAIL NO. 7008 1140 0001 6087 4485

DuPont Performance Elastomers L.L.C., LaPlace, Louisiana
Chloroprene Unit – AI# 38806
Periodic Report For the Period of
September 19, 2009 to March 18, 2010

RECEIVE
APR 23 2010
Air/Toxics & Inspection Coordination Branch

DuPont Performance Elastomers is submitting this Periodic Report for the Chloroprene Unit as required under 40 CFR 63.152(c)(2). This report addresses the information specified in 63.117 and 63.118 for process vents, 63.122 for storage vessels, 63.129 for transfer operations, and 63.146 for process wastewater.

PROCESS VENTS

40 CFR 63.117(a)(7)

Group 2 Vents with a TRE index value greater than 1.0 but less than 4.0.

1. Monitoring Requirements - This facility has one Group 2 process vent with a TRE between 1 and 4. The current Title V Permit, Part 70 Specific Condition No. 2, sets the monitoring requirement for this source.

   "The permittee shall keep the cooling media (brine) temperature of the CD Reactor System's Strippers (A and B lines) condenser, Emission Point 1110-4, below 10°C to maintain a TRE above 1. The maximum temperature shall be below 10°C to ensure Group 2 process vent status. Daily averages of this temperature shall be maintained. Any average temperature outside the range established (10°C) shall be reported in the Periodic Report required under 63.152(c)."

   During this reporting period the daily average temperature of the cooling media on the condenser servicing source 1110-4 was below 10°C while the unit was in operation. No exceedances were experienced during this reporting period.

40 CFR 63.118(f)

This facility has one Group 1 process vent – the Mole Sieve Vent (7000-10A.5), this vent discharges to the Monomer flare. This flare is equipped with a heat-sensing device; presence of the flame is recorded through a process monitoring and control system. Flare is required to have a lit pilot while the Mole Sieve Vent (intermittent flow) is venting.

(1) Daily average values of monitored parameters outside the ranges established in the Notification of Compliance Status.

Not applicable. This vent is controlled with a flare, per 40 CFR 63.118(a)(5), records of the times and duration of all periods during which the pilot flame is absent shall be kept rather than daily averages.

(2) For Group 1 points, duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data.

None.

(3) Times and duration of all periods when the vent stream was diverted from the control device through a bypass line.

Not applicable, this control device does not have a bypass line that can be used to divert the vent stream.

(4) Periods in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line was checked out.

Not applicable, see item 3 above.

(5) Times and duration of all periods in which the pilot flame was absent:

From 10/14/09 @ 04:48 until 10/15/09 @ 22:16 – 41 hours and 38 minutes, the flare was down for maintenance while the units were down.

(6) Reports on carbon bed regeneration cycles.

Not applicable, carbon beds are not used to treat Group 1 vents.

<u>40 CFR 63.118(g)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent to become a Group 1 process vent.

<u>40 CFR 63.118(h)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent with a TRE greater than 4 to become a Group 2 process vent with a TRE less than 4.

<u>40 CFR 63.118(i)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent with a flow rate less than 0.005 scm per minute, to become a Group 2 process vent with a flow rate of 0.005 scm per minute or greater, and a TRE value less than or equal to 4.

40 CFR 63.118(j)

There were no process changes made during this reporting period that caused a Group 2 process vent with an organic HAP concentration of less than 50 ppm to become a Group 2 process vent with a HAP concentration of 50 ppm or grater and a TRE value less than or equal to 4.

STORAGE VESSELS

40 CFR 63.122 – The Chloroprene Unit does not have Group 1 storage vessels.

TRANSFER OPERATIONS

40 CFR 63.129 – The Chloroprene Unit does not have Group 1 transfer operations.

PROCESS WASTEWATER

40 CFR 63.146 – Not applicable. This facility is in compliance with the HON Wastewater provisions. All process wastewater sources at this unit are Group 2. No changes in the average flow rate or average VOHAP concentration for the streams occurred during the reporting period.

PERIODIC START UP, SHUTDOWN, AND MALFUNCTION REPORT

Per 40 CFR 63.10(d)(5)(i) this report is not required since during this reporting period the Chloroprene Unit did not experience a start up or shutdown which caused the source to exceed any applicable emissions limits.

AI/AI/CO

1100069958 04
L804
V10

DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

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6EN-A

Certified Mail No 7006 2760 0000 2201 4544

Routine Air Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div.
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

July 1, 2010

RE: SOCMI HON H Fugitive Emission Monitoring Report for 1st Half of 2010
DuPont Para-phenylenediamine (Diamines) Unit in La Place, LA
LA Air Permit: 2090-V2, Agency Interest No: 1101

Enclosed is the first half of 2010 Semi-Annual Fugitive Emissions Monitoring Report for DuPont's Para-phenylenediamine (Diamines) Unit located in La Place, Louisiana. This unit is subject to the SOCMI HON H fugitive emissions program, the most stringent of the fugitive emissions programs applicable to the facility. This routine report is being submitted as required by 40 CFR 63.182.d.1 and covers January 1, 2010 through June 30, 2010.

A copy of this report has also been sent to the LDEQ. If you have any questions or need any additional information, please contact me at (985) 536-5798.

Sincerely,

Sarah Beth Warren

Sarah Beth Warren
DuPont Environmental Coordinator
586 Hwy 44
LaPlace, LA 70069

Enclosures

cc: LDEQ Office of Environmental Compliance, PO Box 4312, Baton Rouge
Certified Mail No 7006 2760 0000 2201 4551

SYNTHETIC ORGANIC CHEMICAL MANUFACTURING INDUSTRY (SOCMI)
NATIONAL EMISSION STANDARDS FOR HAZARDOUS ORGANIC AIR POLLUTANTS (HON)

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Coordination Branch

SEMIANNUAL REPORT FOR EQUIPMENT LEAKS
(40 CFR 63.182(d), SUBPART H)

1) **NAME OF FACILITY:** DuPont Pontchartrain Site
LOCATION OF FACILITY: LaPlace, LA
PROCESS UNIT: Diamines Production Unit
REPORT PERIOD: 1/1/2010 through 6/30/2010

Section 63.168(d) – VALVES
Phase III monitoring frequency. As of 6/30/2010, this process unit had 0% leaking valves, calculated in compliance with section 63.168(e) definition of percent leaking valves as a rolling average of two consecutive annual monitoring periods. As a result, the 2010 monitoring frequency will stay at once per year (March) as specified in paragraph (d) for process units with less than 0.5% leaking valves.

(i)	JAN	FEB	MAR	APR	MAY	JUN
Number of leaking Gas/Vapor & LL service valves detected	0	0	0	0	0	0
Percent of leaking Gas/Vapor & LL service valves	0	0	0	0	0	0
Number of Gas/Vapor & LL service valves monitored	0	0	0	0	0	0

(ii) 0 = The number of leaking Gas/Vapor & LL service valves that were not repaired within 15 days
0 = The number of non-repairable Gas/Vapor & LL service valves included in the above quantity

Section 63.163 – PUMPS
Phase III requirements apply.

(iii)	JAN	FEB	MAR	APR	MAY	JUN
The number of leaking LL service pumps detected	0	0	0	0	0	0
The percent of leaking pumps	0	0	0	0	0	0
The number of pumps monitored	5	5	5	5	5	5
(iv)Number of leaking pumps not repaired within 15 days	0	0	0	0	0	0

Section 63.164 – COMPRESSORS (Not applicable)

(v) 0 = The number of leaking compressors detected

(vi) ---- = The number of leaking compressors that were not repaired within 15 days

Section 63.173 – AGITATORS (Not applicable)

(vii) 0 = The number of leaking Gas/Vapor & LL service agitators detected

(viii) ---- = The number of leaking Gas/Vapor & LL service agitators not repaired within 15 days

Section 63.174 – CONNECTORS

Zero percent leaking connectors found in first quarter 1996 and in first quarter 1998. Once every four years is the monitoring frequency under Phase III. Re-monitoring of connectors, required in the first quarter 2010 was performed, and 0% leaking connectors were found. The next monitoring year will be in 2014. The alternative allowed in section 63.174 (c)(1)(ii) applies to these components.

(ix) 0 = The number of leaking Gas/Vapor & LL service connectors detected
0 = The percent of leaking Gas/Vapor & LL service connectors
252 = The number of Gas/Vapor & LL service connectors monitored including 27 difficult to monitor.

(xi) 0 = The number of leaking Gas/Vapor & LL service connectors not repaired within 15 days
0 = The number of non-repairable Gas/Vapor & LL service connectors included in the above quantity.

(xiii) **EXPLAIN DELAY OF REPAIRS, IF ANY, AND WHY PROCESS UNIT SHUTDOWN WAS TECHNICALLY INFEASIBLE, APPROPRIATE.**

(xiv) **RESULTS OF MONITORING TO SHOW COMPLIANCE WITH SECTIONS 63.164(I), 63.165(A), AND 63.172(F)**

- 63.164 – Not applicable.
- 63.165(a) "Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with an instrument reading of less than 500 parts per million above background…" Zero were found leaking.
- 63.167 – All 304 open-ended lines are provided caps or plugs. Compliance is verified by periodic audits using the cap and plug location list. An audit on Sep 21 found all required caps in place.
- 63.172(f) – Annual Closed Vent System monitoring was done as scheduled in Nov 2008. No leaks were detected - see next paragraph for count.

WAS ANY ANNUAL MONITORING COMPLETED THIS PERIOD?
Yes, the annual connector monitoring was completed in the first half of 2010.

(xv) **HAS THE PLANT INITIATED MONTHLY MONITORING OF VALVES OR QIP FOR VALVES OR PUMPS.**
Not applicable

(xvi) **DOES THE PLANT WISH TO CHANGE CONNECTOR MONITORING ALTERNATIVES**
Not applicable

(xvii) **WERE THERE ANY PROCESS UNIT SHUTDOWNS DURING THIS REPORTING PERIOD? (IF SO LIST DATES.)**
Yes, the Diamines Unit was down in the first half of 2010 during the following dates: January 12, March 11 – April 14, April 28 – 29, May 15 – 23, and May 25 – 27.

Sarah Beth Warren — 1. Jul. 2010

Sarah Beth Warren, Environmental Coordinator — Date

AY/AI/CO

110006995804

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DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

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Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region VI Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

July 2, 2010

RE: NESHAP Y Benzene Storage Tank Quarterly Report
Period: Apr 1, 2009 - Jun 30, 2009
Facility: DuPont DCSE in LaPlace, LA

On behalf of E. I. duPont de Nemours and Co., Inc., I am submitting the second quarter 2008 report for Flammable Vent Header Flare #1 (source 1500-34) and Flammable Vent Header Flare #2 (source 1500-66). This report is required under 40 CFR 61.275(e)(1). These flares serve as the emission control devices for the Benzene Storage Tank in the Diamines Unit. The tank is covered under Subpart Y of the NESHAP.

As required by the referenced regulation, this report includes a list of the time and duration of emission control system upsets or malfunctions. A copy of this report is also being sent to the Louisiana Department of Environmental Quality. If you have any questions or need any additional information, please contact me at (985) 536-5798.

Sincerely,

Sarah Beth Warren

Sarah Beth Warren
Environmental Coordinator

Enclosure

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
FLARE OUTAGE REPORT FOR BENZENE NESHAP STORAGE TANK

Report Period
Apr 1, 2010 through Jun 30, 2010

I certify that, to the best of my knowledge, the information submitted in the report is accurate.

Signature: Walter L. Glenn Date 7-2-2010
Walter L. Glenn, Plant Manager

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR BENZENE NESHAPS
QUARTERLY REPORT OF EMISSION CONTROL
SYSTEM UPSETS/MALFUNCTIONS
PARA 61.275 (e)(1)(2)(3)

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SEN-A

SECOND QUARTER 2010

DATE	TIME START	TIME STOP	TIME LENGTH	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	ESTIMATED BENZENE RELEASE (LB)
There were no upsets or malfunctions of Flammable Vent Header Flare #1 (1500-34) during the second quarter of 2010							
There were no upsets or malfunctions of Flammable Vent Header Flare #2 (1500-65) during the second quarter of 2010							

AI/AVCC

11000699 5804

DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

LA 804
Vol. 10

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DuPont
Performance Elastomers

July 14, 2010

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, La. 70821-4312

CERTIFIED MAIL NO. 7008 1140 0001 6087 4621

Re: DuPont Performance Elastomers L.L.C. – Pontchartrain Site – AI#38806
Polymers and Resins Group I MACT (40 CFR Part 63, Subpart U)
Periodic Report (non-LDAR) for November 16, 2009 through May 15, 2010

Enclosed is the non-equipment leak Periodic Report under 40 CFR Part 63, Subpart U, of the Polymers & Resins Group I MACT regulation, for the DuPont Performance Elastomers (DPE) Neoprene Plant located in LaPlace, Louisiana. As required by 40 CFR §63.506(e)(6)(i), this non-equipment leak Periodic Report covers the 6-month period beginning November 16, 2009 and ending on May 15, 2010.

It is our understanding that an affected source is required to submit periodic reports for equipment leaks following a separate schedule from the periodic reports covering all other requirements of the Polymers & Resins Group I MACT standard. Semi-annual LDAR reports are being submitted to your office as required under the referenced regulations.

A detailed analysis of the Periodic Report elements in 40 CFR §63.506(e)(6) is attached. Those applicable and not applicable (N/A) to DPE's Neoprene Unit are noted.

If you have any questions or need additional information, you can contact me at (985) 536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P. E.
Environmental Technical Associate

Enclosures

cc: Mr. David Garcia
U.S. EPA Region 6
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7008 1140 0001 6087 4238

DUPONT PERFORMANCE ELASTOMERS L.L.C.

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

TITLE V OPERATING PERMIT NO. 2249-V6

P&R I MACT – PERIODIC REPORT (non-LDAR)

STARTING DATE: NOVEMBER 16, 2009

ENDING DATE: MAY 15, 2010

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Coordination Branch
SEN

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Walter L. Glenn
Responsible Official's Title	Plant Manager
Signature	Walter L. Glenn
Date Signed	July 14, 2010

Analysis of Periodic Reporting Requirement of Polymers & Resins Group I MACT, 40 CFR Part 63, Subpart U, §63.506(e)(6)
Periodic Report (non-LDAR) for DuPont Performance Elastomers L.L.C.
Pontchartrain Site, LaPlace, Louisiana
Reporting period beginning on November 16, 2009 and ending on May 15, 2010

40 CFR §63.506(e)(6)(i). Frequency of reporting and time period covered.

This paragraph refers to paragraphs (e)(6)(xi) and (e)(6)(xii) of §63.506 as potentially applicable exceptions to the requirement to submit semiannual Periodic Reports. Paragraph (e)(6)(xi) addresses emission points included in an emissions average. The affected Elastomer Product Process Unit (EPPU) is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in paragraph (e)(6)(xi) is not applicable (N/A).

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with these limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had no control or recovery devices for a particular emission point or process section that had excursions, as defined in §63.505(g).

The second requirement concerning quarterly reporting under paragraph (e)(6)(xii) relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(2). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

In the absence of a requirement to submit quarterly reports, Periodic Reports are required semiannually by paragraph (e)(6)(i). The first report was required to be submitted no later than 240 days after the date the Notification of Compliance Status was due. The Notification of Compliance Status submittal deadline was November 16, 2001. The date 240 days after the November 16, 2001 date is July 14, 2002. In addition, the first Periodic Report was required to address the six-month period beginning on the date that the Notification of Compliance Status was due. Periodic Report #1 (non-LDAR) thus covered the reporting period beginning on November 16, 2001, and ending on May 15, 2002. This Periodic Report covers the six-month reporting period, beginning on November 16, 2009, and ending on May 15, 2010.

40 CFR §63.506(e)(6)(ii). Content of Periodic Reports under certain conditions.

If during the reporting period, the affected source experienced none of the compliance exceptions or activities identified in §§63.506(e)(6)(iii) through (e)(6)(ix), then the Periodic Report is to take the short form. In this case, the Periodic Report should contain a statement that there were no compliance exceptions as specified in paragraphs (e)(6)(iii) through (e)(6)(ix) of §63.506 for the six-month period covered by the report, and that none of the activities specified in those same paragraphs occurred during the same six-month period.

40 CFR §63.506(e)(6)(iii). Content of Periodic Reports under all other conditions.

This paragraph references specific information to be provided in the Periodic Report if the conditions in the preceding paragraph (e)(6)(ii) were not met during the reporting period. The paragraph applies to affected sources subject to §63.484 through 63.501 for any emission point. This equates to affected sources subject to Subpart U and having specific applicable requirements for any combination of storage vessels, continuous front-end process vents, batch front-end process vents, back-end process vents, or process wastewater. The affected EPPU identified its specific applicable requirements in its Notification of Compliance Status submittal.

The affected EPPU notes that §63.501(a) identifies the applicable requirements for maintenance wastewater as §63.105(a). The applicable requirements for maintenance wastewater do not include any requirement to report information in the Periodic Reports required by §63.506(e)(6).

40 CFR §63.506(e)(6)(iii)(A). Cross-references to specific reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Cross-reference (40 CFR)	Required Information and Applicability
§63.122(a)(4) for storage vessels	Relates to Group 1 storage vessels (N/A)
§§63.117(a)(3), 63.118(f), and 63.485(s)(5) for continuous front-end process vents	§63.117(a)(3) relates to TRE determinations or performance tests conducted after the Notification of Compliance Status (NoCS) has been submitted. - The affected EPPU had no process changes during this reporting period that required a recalculation of the TRE index value. - The affected EPPU conducted no performance tests during this reporting period. §63.118(f)(1) relates to daily average values of monitored parameters for all operating days when daily average values recorded were outside the levels established in the NoCS or the Title V operating permit - The affected EPPU had no such days during this reporting period. §63.118(f)(2) relates to Group 1 emission points with excursions caused by insufficient monitoring data (N/A). §63.118(f)(3) relates to the times and durations of periods recorded when the vent stream is diverted from its control device through a bypass line (N/A). §63.118(f)(4) relates to periods recorded when the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line valve was checked out (N/A). §63.118(f)(5) relates to periods when all pilot flames of a flare were absent (N/A). §63.118(f)(6) relates to carbon bed regeneration cycles with recorded parameters outside the levels established in the NoCS or the Title V operating permit (N/A). §63.485(s)(5) relates to Group 1 continuous front-end process vents controlled using an internal combustion engine (N/A).
§63.492 for batch front-end process vents and aggregate batch vent streams	§63.492(a) relates to information required in the NoCS (N/A). §63.492(b) relates to process changes causing a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. §63.492(c) relates to process changes that – - cause a Group 2 batch front-end process vent with annual emissions less than 11,800 kg/year to have annual emissions greater than or equal to 11,800 kg/year but not changing the Group 2 status of the batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. - or require redetermination of the batch mass input limitation (N/A). §63.492(d) specifies process changes for which reporting is not required (N/A).

Cross-reference (40 CFR)	Required Information and Applicability
§63.492 for batch front-end process vents and aggregate batch vent streams (continued)	§63.492(e) relates to information required in the Precompliance Report for alternative control devices or alternative monitoring parameters (N/A). §63.492(f) relates to affected sources required to monitor bypass lines around control devices per §63.489(d) (N/A).
§63.499 for back-end process operations	The affected EPPU has no back-end process requirements per §63.494(a)(4) (N/A).
§63.104(f)(2) for heat exchange systems	Addresses reporting requirements if the delay-of-repair provisions are invoked (N/A). Note: The affected EPPU has heat exchange systems meeting the condition specified in §63.104(a)(1)—that the heat exchange systems are operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side. Accordingly, the requirements of §63.104(a)(1) do not apply to the affected EPPU.
§63.146(c) – (g) for process wastewater	§63.146(c) relates to waste management units that receive, manage, or treat Group 1 process wastewater stream(s) or residual(s) removed from Group 1 process wastewater stream(s) (N/A). §63.146(d) relates to treatment processes for Group 1 process wastewater streams and/or residuals removed from Group 1 wastewater streams (N/A). §63.146(e) relates to control devices for organic HAP emissions from Group 1 process wastewater streams (N/A). §63.146(f) relates to owners or operators who have obtained approval to use an alternative treatment process or control device or to monitor a set of alternative parameters and therefore have alternate reporting requirements (N/A). §63.146(g) relates to extensions of time to empty and remove a Group 1 process wastewater tank equipped with a floating roof from service for inspection or repairs to the floating roof per §63.133(e)(2) or for control equipment repair per §63.133(h) (N/A)

40 CFR §63.506(e)(6)(iii)(B). Reporting requirements for excursions.

This paragraph requires the owner or operator of the affected EPPU to report the daily average values or batch cycle daily average values of monitored parameters for each excursion.

Excursions are defined by paragraphs (g) and (h) of §63.505. As noted above, §63.505(h) does not apply to the affected EPPU but §63.505(g) does. In addition, for excursions caused by lack of monitoring data, the owner or operator is to specify the start time and duration of each period when monitoring data were not collected. No excursions were experienced during this reporting period.

40 CFR §63.506(e)(6)(iii)(C). [Reserved.]

40 CFR §63.506(e)(6)(iii)(D). Additional reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Citation (40 CFR §63.506)	Required Information and Applicability
(e)(6)(iii)(D)(*1*)	Supplements to the Emissions Averaging Plan, if any, per paragraph (e)(4)(iii) (N/A).
(e)(6)(iii)(D)(*2*)	Notification if a process change is made that changes the group status of any emission point from Group 2 to Group 1. - The affected EPPU had no such process changes during the reporting period.
(e)(6)(iii)(D)(*3*)	Notification of addition of one or more emission points or EPPUs to the affected source, with description and notification of the group status of the additional emission point or of all emission points in the EPPU. - The affected EPPU added no emission points or EPPUs during the reporting period.
(e)(6)(iii)(D)(*4*)	For EPPUs producing styrene-butadiene rubber by an emulsion process, notification of changes in standard operating procedures affecting carbon disulfide concentration in crumb dryer exhaust (N/A).
(e)(6)(iii)(D)(*5*)	Changes in the identity of the treatment facility or transferee receiving process wastewater streams for treatment pursuant to §63.132(g) (N/A).

40 CFR §63.506(e)(6)(iii)(E). Start-up, shutdown, and malfunction reports.

[Please note that the U.S. Environmental Protection Agency amended 40 CFR §63.10(d)(5)(i) and the final rule was published in the Federal Register on May 30, 2003 (68 FR 32586). This notice requires the submittal of a Shutdown and Malfunction Report with the Periodic Reports. The Neoprene Unit has procedures in place that meet the requirements of this regulation. Since this facility does not have a Group 1 source, it is our understanding, based on 40 CFR §63.506(b)(i), that a Shutdown and Malfunction Report is not required.]

This paragraph refers to the information required by paragraph (b)(1)(ii) of §63.506. In turn, §63.506(b)(1)(ii) requires semiannual start-up, shutdown and malfunction reports to be submitted on the same schedule as the non-LDAR Periodic Reports and to include the information specified in §63.10(d)(5)(i).

The affected EPPU notes, however, that paragraph (b)(1) of 40 CFR §63.506 does not require the owner or operator of an affected source to include Group 2 emission points in the written start-up, shutdown and malfunction plan unless the Group 2 emission points are included in an emissions average. Further, this paragraph limits the start-up, shutdown and malfunction plan requirement to control devices for equipment leaks and makes it optional for other equipment. The affected EPPU has no Group 1 emission points and no control devices for equipment leaks. Accordingly, the affected EPPU asserts that it is not required to develop and implement a written start-up, shutdown and malfunction plan pursuant to §63.506(b)(1).

Furthermore, §63.506(b)(1) states in its final sentence that reports related to the plan shall be submitted as specified in paragraph (b)(1)(ii) of §63.506. If the affected EPPU is not required by §63.506(b)(1) to have a written start-up, shutdown and malfunction plan, the affected EPPU asserts that it is also not required to submit reports related to that plan.

40 CFR §63.506(e)(6)(iv). Batch mass input limitation.

This paragraph requires the owner or operator to report once per year (i.e., in every other Periodic Report) the mass of HAPs or material input to the batch unit operation during the 12-month period covered by the current and previous Periodic Reports. In addition, the owner or operator must state whether the batch front-end process vent subject to the batch mass input limitation complied with the batch mass input limitation.

The affected EPPU indicated in its Notification of Compliance Status submittal that its determination of the group status of its set of batch front-end process vents was based on annualized emissions from maximum production of its single highest-HAP recipe. The result of this determination was that the affected EPPU's batch front-end process vents are Group 2. Consequently, the affected EPPU elected to comply with 40 CFR §63.487(g)(4) and §63.487(h). This compliance option does not require the affected EPPU to establish a batch mass input limitation. The affected EPPU made no recipe

changes during the reporting period that changed the identity or the composition of the single highest-HAP recipe on which this determination was based.

The election of the affected EPPU to comply with §63.487(h) for its batch front-end process vents invokes the reporting requirements of paragraphs (a)(5), (a)(6), and (b) of §63.492. The information in paragraphs (a)(5) and (a)(6) was included in the affected EPPU's Notification of Compliance Status submitted November 16, 2001, and is not required to be included in Periodic Reports.

§63.492(b) relates to process changes that cause a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. As noted in the table presented in the discussion above of reporting requirements under 40 CFR §63.506(e)(6)(iii)(A), the affected EPPU made no process changes during the reporting period that caused a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. Accordingly, this Periodic Report includes no notification and description of any process change as specified in 40 CFR §63.492(b).

40 CFR §63.506(e)(6)(v). Reporting of performance tests.

This paragraph specifies the information required for performance tests conducted during the reporting period. The affected EPPU did not conduct any performance tests during the period covered by this Periodic Report.

40 CFR §63.506(e)(6)(vi). Change in primary product.

This paragraph requires notification of any change in the primary product of the affected EPPU. The affected EPPU did not change its primary product during the period covered by this Periodic Report.

40 CFR §63.506(e)(6)(vii). Changes in predominant use determinations for storage tanks assigned to an affected EPPU.

The storage tanks at the affected EPPU did not require a predominant use determination. Therefore, this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(viii). Changes in predominant use determinations for recovery operations equipment assigned to an affected EPPU.

The recovery operations equipment at the affected EPPU did not require a predominant use determination. Therefore, this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(ix). Reduced recordkeeping program.

This paragraph requires notification of the owners or operator's election to comply with the recordkeeping provisions of §63.506(h)(1) as an alternative to the continuous operating parameter monitoring and recordkeeping provisions of Subpart U. The affected EPPU has made no such election, and therefore this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(x). Further reduced recordkeeping provisions.

This paragraph requires notification of the owner or operator's election not to retain daily average or batch cycle daily average values as a further reduction in recordkeeping for monitored parameters that would otherwise be subject to the Subpart U provisions for continuous operating parameter monitoring and recordkeeping, as provided by §63.506(h)(2). The affected EPPU notes that owners or operators wishing to avail themselves of this option must first comply with §63.506(h)(1) for at least six months with no excursions. The affected EPPU has not elected to comply with §63.506(h)(1). Accordingly, the affected EPPU is not eligible for this alternative, and this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(xi). Quarterly reporting requirements for emission points included in an emissions average.

The affected EPPU is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in this paragraph does not apply.

40 CFR §63.506(e)(6)(xii). Quarterly reporting requirements for emission points or EPPUs not included in an emissions average.

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has had more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with the limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had no excursions are defined by this section.

The second requirement under paragraph (e)(6)(xii) concerning quarterly reporting relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(2). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

H/AV6

11000699 5804

DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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Vol. 10

DuPont
Performance Elastomers

July 14, 2010

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7008 1140 0001 6087 4621

Re: DuPont Performance Elastomers L.L.C. – Pontchartrain Site – AI#38806
40 CFR Part 63, Subpart FFFF
Periodic Report – ACR Unit

Dear Ms. Nolan:

Enclosed is the fourth Periodic Report under 40 CFR Part 63, Subpart FFFF, the MON MACT regulation, for the DuPont Performance Elastomers ACR Unit located in LaPlace, Louisiana. This Periodic Report covers the period of January 1 to June 30, 2010.

If you have any questions or comments, you can contact me at 985-536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

cc: Mr. David Garcia
U.S. EPA Region 6
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7008 1140 0001 6087 4638

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DUPONT PERFORMANCE ELASTOMERS L.L.C.

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

ACR UNIT

40 CFR Part 63, Subpart FFFF – PERIODIC REPORT (non-LDAR)

STARTING DATE: JANUARY 1, 2010

ENDING DATE: JUNE 30, 2010

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Walter L. Glenn, Plant Manager
Signature	Walter L. Glenn
Date Signed	July 14, 2010

Periodic Report for the ACR Unit
40 CFR Part 63, Subpart FFFF, §63.2520(e)
DuPont Performance Elastomers L.L.C.
Pontchartrain Site, LaPlace, Louisiana

40 CFR §63.2520(e)(1) Company Name and Address

DuPont Performance Elastomers
560 Highway 44
LaPlace, La. 70068
Contact – Doris B. Grego
Phone – 985-536-5437
e-mail – doris.b.grego@usa.dupont.com

40 CFR §63.2520(e)(2) Statement by Responsible Official

Included with this submittal.

40 CFR §63.2520(e)(3) Reporting Period

Reporting period beginning on January 1, 2010 and ending on June 30, 2010.

40 CFR §63.2520(e)(4) SSM Malfunctions

There were no SSM in which excess emissions occurred during this reporting period.

40 CFR §63.2520(e)(5) Deviations

No deviations from the permitted limits or permit conditions were experienced during this reporting period.

40 CFR §63.2520(e)(6) CEMS

This facility is not required to have CEMs.

40 CFR §63.2520(e)(7) Operating Scenarios

There were no new operating scenarios since the notification of compliance status was submitted.

40 CFR §63.2520(e)(8) Process Unit Groups

No new process units were added to this facility.

40 CFR §63.2520(e)(9) Other Records

Heat Exchange Systems (63.104(f)(2): This facility does not have heat exchange systems that meet this definition.

Wastewater (63.146(c), (d) and (e): This facility does not have wastewater streams which contain listed HAPs.

Equipment Leaks: If complying with Subpart H, submit the information listed in §63.182(d). If complying with Subpart UU, submit the information listed in §63.1039(b). This facility has selected to comply with Subpart H. The information required under §63.182(d) is included with this report (pages 4 and 5).

Closed Vent Systems and Control Devices: This facility does not have close vent systems.

Floating Roof Tanks: This facility does not have floating roof tanks.

40 CFR §63.2520(e)(10) Notification of Process Change

There were no process changes to this facility during this reporting period that meet the requirements of this subpart.

LDAR PERIODIC REPORT
COVERS THE PERIOD OF JANUARY 1 TO JUNE 30, 2010
[Information required under 40 CFR §63.182(d)(1)]

1. NAME OF FACILITY: DuPont Performance Elastomers

PROCESS UNIT: ACR Unit

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2010					
		JAN.	FEB.	MAR.	APR.	MAY.	JUN.
(i)	No. valves found leaking	0	-	0	-	0	0
	Percent valves leaking	0	-	0	-	0	0
	Total no. monitored	54	-	180	-	115	164
(ii)	No. leaking valves not repaired	0	-	0	-	0	0
	No. valves not repairable	0	-	0	-	0	0
(iii)	No. pumps found leaking	0	0	0	0	0	0
	Percent leaking pumps	0	0	0	0	0	0
	Total no. monitored	19	19	19	19	19	19
(iv)	No. leaking pumps not repaired	0	0	0	0	0	0
(v)	No. compressors found leaking	NA	NA	NA	NA	NA	NA
(vi)	No. leaking compressors not repaired	NA	NA	NA	NA	NA	NA
(vii)	No. agitators found leaking	NA	NA	NA	NA	NA	NA
(viii)	No. leaking agitators not repaired	NA	NA	NA	NA	NA	NA
(ix)	No. leaking connectors	-	-	-	-	-	-
	Percent connectors leaking	-	-	-	-	-	-
	Total no. monitored	-	-	-	-	-	-

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2010					
		JAN.	FEB.	MAR.	APR.	MAY.	JUN.
(x)	Reserved						
(xi)	No. leaking connectors not repaired	-	-	-	-	-	-
	No. connectors not repairable	-	-	-	-	-	-
(xii)	Reserved						

(xviii) Explain delay of repairs, if any, and why process unit shutdown was technically infeasible, if appropriate.

None

(xiv) Results of monitoring to comply with:

63.164 (i) – This unit does not have compressors in organic service.

63.165 (a) – This unit does not have pressure relief devices in organic service.

63.172 (f) – Not applicable

(xv) Not applicable

(xvi) Connectors Monitoring Alternatives – Since the implementation of the fugitive emission program, this unit has used the monitoring alternative described under 63.174(c)(1)(ii).

(xvii) Not applicable

AI/AVCO

110006995804
DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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DuPont
Performance Elastomers

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July 14, 2010

Mr. David Garcia
Compliance Assurance and Enforcement Division
Mail Number: 6-EN-A
U.S. EPA Region 6
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733

CERTIFIED MAIL NO. 7008 1140 0001 6087 4638

Dear Mr. Garcia:

As required under 40 CFR 63.502(i), DuPont Performance Elastomers, Pontchartrain Site, is submitting the Periodic Report for Equipment Leaks for the Neoprene Manufacturing Unit for the period of January 1 through June 30, 2010.

This unit is located in LaPlace, Louisiana and belongs to Group I, Polymer & Resins Category. All monitoring of fugitive emissions has been performed as required by 40 CFR 63.160.

We trust this information complies with the requirements of the referenced regulations. If you have any questions you can contact me at (985) 536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B Grego

Doris B. Grego, P. E.
Environmental Technical Associate

Enclosures

cc: LDEQ – Office of Environmental Compliance – AI# - 38806
Certified Mail No. 7008 1140 0001 6087 4621

2010 FIRST SEMI-ANNUAL REPORT

[Information required under 40 CFR §502(i) AND §63.182(d), SUBPART H & I]

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Coordination Branch
SEN.

1. NAME OF FACILITY: DuPont Performance Elastomers

PROCESS UNIT: Neoprene Manufacturing Unit

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2010					
		JAN.	FEB.	MAR.	APR.	MAY.	JUN.
(i)	No. valves found leaking	0	-	-	-	-	0
	Percent valves leaking	0	-	-	-	-	0
	Total no. monitored	36	-	-	-		1117
(ii)	No. leaking valves not repaired	0	-	-	-	-	0
	No. valves not repairable	0	-	-	-	-	0
(iii)	No. pumps found leaking	0	0	0	0	0	0
	Percent leaking pumps	0	0	0	0	0	0
	Total no. monitored	41	41	41	40[1]	40[1]	41
(iv)	No. leaking pumps not repaired	0	0	0	0	0	0
(v)	No. compressors found leaking	NA	NA	NA	NA	NA	NA
(vi)	No. leaking compressors not repaired	NA	NA	NA	NA	NA	NA
(vii)	No. agitators found leaking	0	1	0	0	2	0
(viii)	No. leaking agitators not repaired	0	0	0	0	0	0
(ix)	No. leaking connectors	-	-	-	-	-	-
	Percent connectors leaking	-	-	-	-	-	-
	Total no. monitored	-	-	-	-	-	-

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2010					
		JAN.	FEB.	MAR.	APR.	MAY.	JUN.
(x)	Reserved						
(xi)	No. leaking connectors not repaired	-	-	-	-	-	-
	No. connectors not repairable	-	-	-	-	-	-
(xii)	Reserved						

(xiii) Explain delay of repairs, if any, and why process unit shutdown was technically infeasible, if appropriate.

None.

(xiv) Results of monitoring to comply with:

63.164 (i) – This unit does not have compressors in organic service.

63.165 (a) – Pressure relief devices are monitored once a month to insure they operate below the 500 ppm limit.

63.172 (f) – Not applicable

(xv) Not applicable

(xvi) Connectors Monitoring Alternatives – Since the implementation of the fugitive emission program, this unit has used the monitoring alternative described under 63.174(c)(1)(ii).

(xvii) Not applicable

Notes:
1. One pump was out of service in April and May.

AI/AI/CO

110000597131
804 LA V10

DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

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Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

October 13, 2010

RE: NESHAP Y Benzene Storage Tank Quarterly Report
Period: July 1, 2010 - Sept 30, 2010
Facility: DuPont DCSE in LaPlace, LA

On behalf of E. I. duPont de Nemours and Co., Inc., I am submitting the third quarter 2010 report for Flammable Vent Header Flare #1 (source 1500-34) and Flammable Vent Header Flare #2 (source 1500-66). This report is required under 40 CFR 61.275(e)(1). These flares serve as the emission control devices for the Benzene Storage Tank in the Diamines Unit. The tank is covered under Subpart Y of the NESHAP.

As required by the referenced regulation, this report includes a list of the time and duration of emission control system upsets or malfunctions. A copy of this report is also being sent to the Louisiana Department of Environmental Quality. If you have any questions or need any additional information, please contact me at (985) 536-5409.

Sincerely,

Kirtland R. Wilkes
P.E. Environmental Engineering

Enclosure

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR BENZENE NESHAPS
QUARTERLY REPORT OF EMISSION CONTROL SYSTEM UPSETS/MALFUNCTIONS
PARA 61.275 (e)(1)(2)(3)

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THIRD QUARTER 2010

DATE	TIME START	TIME STOP	TIME LENGTH	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	ESTIMATED BENZENE RELEASE (LB)
There were no upsets or malfunctions of Flammable Vent Header Flare #1 (1500-34) during the third quarter of 2010							
There were no upsets or malfunctions of Flammable Vent Header Flare #2 (1500-65) during the third quarter of 2010							

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
FLARE OUTAGE REPORT FOR BENZENE NESHAP STORAGE TANK

Report Period
July 1, 2010 through Sept 30, 2010

I certify that, to the best of my knowledge, the information submitted in the report is accurate.

Signature: Walter L. Glenn Date Oct 14, 2010
Walter L. Glenn , Plant Manager

AI/AI/CO

11000059 7131
804 LA V.10

DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

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EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

November 17, 2010

RE: SOCMI HON Subpart G Periodic Report
Period: Mar 19, 2010 - Sep 18, 2010
Facility: DuPont DPT in LaPlace, LA

Enclosed is the SOCMI Hon Subpart G Periodic Report for DuPont's p-phenylenediamine (Diamines) Unit located in LaPlace, Louisiana. This report is required per 40 CFR 63.152 (c) and covers the compliance period of March 19, 2010 to September 18, 2010. This Periodic Report also includes a signed Startup, Shutdown, and Malfunction Certification as required per 40 CFR 63.10(d)(5)(i) of Subpart A

A copy of this report is also being sent to LDEQ. If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
Environmental Coordinator

Enclosures:

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

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E. I. DU PONT DE NEMOURS & COMPANY, INC.
PONTCHARTRAIN SITE
LA PLACE, LOUISIANA
P-PHENYLENEDIAMINES (DIAMINES) UNIT

Semi-Annual Periodic Report for
March 19, 2010 through September 18, 2010

Per 40 CFR 63.152(c)(2), this Periodic Report includes all information specified in 63.117 and 63.118 for process vents, 63.122 for storage vessels, 63.129 for transfer operations, and 63.146 for process wastewater. This report covers the period from March 19, 2010 through September 18, 2010.

PROCESS VENTS

40 CFR 63.118(f):

The following Group 1 process vents are routed to the Flammable Vent Header Flare #1 (1500-34) and the Flammable Vent Header Flare #2 (1500-66): the High Boiler Column (1500-34I), the IPP Column (1500-34J), the Low Boiler Column (1500-34K), and the Refining Column (1500-34L).

(1) Daily average values outside ranges established in Notification of Compliance Status:

Not applicable. The Flammable Vent Header Flare#1, 1500-34 and the Flammable Vent Header Flare #2, 1500-66, are used to control all Group 1 process vent emissions. Per 40 CFR 63.118(a)(5), for flares, records of the time and duration of all periods during which the pilot flame is absent shall be kept rather than daily averages. The Primary Flare used is the Flammable Vent Header Flare #2 (1500-66), and the original Flammable Vent Header Flare (1500-34) is used as a backup.

(2) For Group 1 points, duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data:

There were no instances of insufficient monitoring during this reporting period. See Table 1, Insufficient Monitoring Data for Process Vent Control Devices, attached.

(3) Time and duration of all periods when the vent stream is diverted from the control device through a bypass line:

Exempt: Per 40 CFR 63.114(d), equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to this paragraph. The only existing bypass lines that could divert a vent stream away from the control device are there for safety purposes and are, therefore, exempt from this requirement.

(4) Periods in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line valve was checked out:

Exempt: See (3) above.

(5) Time and duration of all periods in which the pilot flame of the Flammable Vent Header Flare, 1500-34, and the Flammable Vent Header Flare #2, 1500-66 were absent:

There were no outages of the Flammable Vent Header Flare, 1500-34, and the Flammable Vent Header Flare #2, 1500-66, during this reporting period. See attached Table 2.

(6) Carbon bed regeneration cycles:

Not applicable. Carbon beds are not used as control devices for Group 1 process vents.

40 CFR 63.118(g),(h),(i),and (j):

There were no process changes made during this report period that caused a Group 2 process vent to become a Group 1 process vent, a Group 2 process vent with a TRE greater than 4.0 to become a Group 2 process vent with a TRE less than 4.0, a Group 2 process vent with a flow rate less than 0.005 scm per minute to become a Group 2 process vent with a flow rate of 0.005 scm per minute or greater with a TRE less than or equal to 4.0, or a Group 2 process vent with an organic HAP concentration less than 50 ppm to become a Group 2 process vent with an organic HAP concentration of 50 ppm or greater with a TRE less than or equal to 4.0. See Table 3, Process Changes Affecting Process Vent Classifications, attached.

STORAGE VESSELS

40 CFR 63.122(g):

Closed vent systems and control devices are used to control emissions from Group 1 storage vessels, the Crude Storage Tank (1500-8A) and the Hydrogenate Storage Tank (1500-38A). The control devices used to control emissions from these storage vessels are the Crude Storage Tank Scrubber (1500-8) and the Hydrogenate Storage Tank Scrubber (1500-38).

(1) Planned routine maintenance operations that would require the control device to not meet the 95% efficiency emission control requirements:

A description of the planned routine maintenance on the control devices which was performed during the previous six months is presented in Table 4. There were maintenance outages on all four devices totaling 208.9 hours during the reporting period. Anticipated maintenance during the next six months is presented in attached Table 5.

(2) For control devices other than a flare, the occurrence when the monitored parameters were outside the parameter ranges documented in the Notification of Compliance Status:

There were no excursions during this reporting period. See attached Table 6.

(3) For flares, the occurrence when the control device did not meet the general control device requirements per 63.11(b):

Not applicable. No flare is used to control emissions from any HON Group 1 storage vessel. (Note that Flammable Vent Header Flare #1, 1500-34 and the Flammable Vent Header Flare #2, 1500-66 are used to control emissions from a Benzene storage tank covered and reported under the Benzene NESHAP program).

TRANSFER OPERATIONS

40 CFR 63.130(d):

Periodic Report information shall be submitted for transfer racks subject to the requirements of 63.126:

Not applicable. Per 40 CFR 63.126(c), recordkeeping provisions are the only requirement for Group 2 transfer operations. All transfer operations sources are Group 2. No changes in design annual throughput, material loaded, or vapor pressure at transfer racks occurred during this reporting period.

PROCESS WASTEWATER

40 CFR 63.146(c),(d),(e),(f),(g):

Not applicable. All process wastewater sources are Group 2. No changes in average flowrate or average VOHAP concentration for wastewater streams occurred during this reporting period.

LEAK INSPECTIONS

40 CFR 63.148(k):

The closed vent systems subject to these provisions are also subject to 63.172 of subpart H; therefore, leak inspections are conducted according to requirements of 63.172.

E. I. DU PONT DE NEMOURS & COMPANY, INC.
PONTCHARTRAIN SITE
LA PLACE, LOUISIANA
P-PHENYLENEDIAMINES (DIAMINES) UNIT

COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
PERIODIC STARTUP, SHUTDOWN, MALFUNCTION
AND CERTIFICATION REPORT PER PARA 63.10(d)(5)(i)

Semi-Annual Periodic Certification for
March 19, 2010 through September 18, 2010

All actions taken by E. I. DuPont de Nemours & Co., Inc., located at the Pontchartrain Site, during startup, shutdown, or malfunction of any process or air pollution control device equipment were consistent with the procedures detailed in the Startup, Shutdown, and Malfunction Plan. This plan was compiled as required per 40 CFR 63.6(e)(3) for the Diamines Unit which produces p-phenylenediamine and is therefore subject to applicable requirements of SOCMI HON regulations. During the reporting of March 19, 2010 through September 18, 2010, all process equipment and air pollution control device equipment was operated in a manner consistent with good air pollution control practices for minimizing emissions to the levels required by all relevant SOCMI HON standards.

I certify that the procedures described in the Startup, Shutdown, and Malfunction Plan were followed:

Signature: Walter L. Glenn Date: 11-18-2010
Walter L. Glenn, Plant Manager

(If the procedures described in the Startup, Shutdown, and Malfunction Plan were not followed, prepare and attach a Startup, Shutdown, and Malfunction Plan Variance Report.)

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.118(f)(2)

TABLE 1
INSUFFICIENT MONITORING DATA FOR PROCESS VENT CONTROL DEVICES

Report Period
March 19, 2010 to September 18, 2010

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH	EQUIP. NO.	EQUIP. NAME	CAUSE OF MALFUNCTION
There was no insufficient monitoring during this reporting period.							

PER PARA 63.118(f)(5)

TABLE 2
FLAMMABLE VENT HEADER FLARE OUTAGES

Report Period
March 19, 2010 to September 18, 2010

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH (HRS)	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	COMMENTS
There were no flammable vent header flare outages during this reporting period.								

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.118(g), (h), (i), (j)

TABLE 3
PROCESS CHANGES AFFECTING PROCESS VENT CLASSIFICATIONS

Report Period
March 19, 2010 to September 18, 2010

PROCESS VENT NO.	PROCESS VENT NAME	GROUP PRIOR TO PROCESS CHANGE	DESCRIPTION OF PROCESS CHANGE	RESULTS OF RECALCULATION	CONTROL DEVICE FOR COMPLIANCE*
There were no process changes affecting any process vents' HON status made during this reporting period.					

* If process changes were made which changed the classification of a process vent, a statement that the owner or operator will comply with all applicable provisions of 40 CFR 63.113 must also be provided with this report.

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.122(g)(1)

TABLE 4
PAST MAINTENANCE FOR CONTROL DEVICES

Report Period
March 19, 2010 to September 18, 2010

MAINTENANCE PERFORMED DURING THE PAST 6 MONTHS					
EQUIP. NO.	EQUIPMENT NAME	TYPE OF MAINTENANCE PERFORMED	FREQUENCY OF MAINTENANCE	DATE PERFORMED	TIME LENGTH
1500-8	Crude Tank Scrubber	Steaming the scrubber.	As needed	8/22/2010	1.62 hours
1500-8	Crude Tank Scrubber	Steaming the scrubber.	As needed	8/22/2010	2.5 hours
1500-8	Crude Tank Scrubber	Steaming the scrubber.	As needed	8/30/2010	4.97 hours
1500-8	Crude Tank Scrubber	Changing the valves on the scrubber letdown line.	As needed	9/18/2010	0.83 hours
				Total	9.92 hours
1500-34	Flammable Vent Header Flare #1	No maintenance this period.			0 hours
				Total	0 hours
1500-38	Hydrogenate Tank Scrubber	Tank stilled for maintenance work.	As needed	3/31/2010	197.92hours
1500-38	Hydrogenate Tank Scrubber	Steaming scrubber (runoff line).	As needed	6/4/2010	0.1 hours
1500-38	Hydrogenate Tank Scrubber	Instrumentaion work.	As needed	8/10/2010	0.75 hours
1500-38	Hydrogenate Tank Scrubber	Steaming scrubber (runoff line).	As needed	8/20/2010	0.17 hours
				Total	198.94 hours
1500-66	Flammable Vent Header Flare #2	No maintenance this period.			0 hours
				Total	0 hours

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.122(g)(1)

TABLE 5
PLANNED MAINTENANCE FOR CONTROL DEVICES

Report Period
March 19, 2010 to September 18, 2010

MAINTENANCE ANTICIPATED TO BE PERFORMED WITHIN THE NEXT 6 MONTHS				
EQUIP. NO.	EQUIPMENT NAME	TYPE OF MAINTENANCE	FREQUENCY OF MAINTENANCE	TIME LENGTH ESTIMATE
1500-8	Crude Tank Scrubber	Routine Yearly Maintenance	None scheduled for the next 6 months	NA
1500-34	Flammable Vent Header Flare No. 1	Routine Yearly Maintenance	Maintenance scheduled for Sept/Oct 2010 S/D	NA
1500-38	Hydrogenate Tank Scrubber	Routine Yearly Maintenance	None scheduled for the next 6 months	NA
1500-66	Flammable Vent Header Flare No. 2	Routine Yearly Maintenance	Maintenance scheduled for Sept/Oct 2010 S/D	NA

*The Diamines Title V Permit (2090-V2) authorizes construction and operation of the Flammable Vent Header Flare No. 2 (1500-66) as the primary flare. The existing Flammable Vent Header Flare (1500-34) shall be used only when the primary flare is down.

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.122(g)(2)

TABLE 6
MONITORED PARAMETER EXCURSIONS FOR STORAGE VESSELS

Report Period
March 19, 2010 to September 18, 2010

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH hrs:min	EQUIP. NO.	EQUIP. NAME	CAUSE OF MALFUNCTION
There were no excursions during this monitoring period.							

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804 2A V.10

DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

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Coordination Branch
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Certified Mail No 7010 3090 0002 7735 0273

Routine Air Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div.
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

July 8, 2011

RE: SOCMI HON H Fugitive Emission Monitoring Report for 1st Half of 2011
DuPont Para-phenylenediamine (Diamines) Unit in La Place, LA
LA Air Permit: 2090-V2, Agency Interest No: 1101

Enclosed is the first half of 2011 Semi-Annual Fugitive Emissions Monitoring Report for DuPont's Para-phenylenediamine (Diamines) Unit located in La Place, Louisiana. This unit is subject to the SOCMI HON H fugitive emissions program, the most stringent of the fugitive emissions programs applicable to the facility. This routine report is being submitted as required by 40 CFR 63.182.d.1 and covers January 1, 2011 through June 30, 2011.

A copy of this report has also been sent to the LDEQ. If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
DuPont Environmental Coordinator
586 Hwy 44
LaPlace, LA 70068

Enclosures

cc: LDEQ Office of Environmental Compliance, PO Box 4312, Baton Rouge
Certified Mail No 7009 3410 0000 0921 5676

SYNTHETIC ORGANIC CHEMICAL MANUFACTURING INDUSTRY (SOCMI)
NATIONAL EMISSION STANDARDS FOR HAZARDOUS ORGANIC AIR POLLUTANTS (HON)

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SEMIANNUAL REPORT FOR EQUIPMENT LEAKS
(40 CFR 63.182(d), SUBPART H)

1) **NAME OF FACILITY:** DuPont Pontchartrain Site
LOCATION OF FACILITY: LaPlace, LA
PROCESS UNIT: Diamines Production Unit
REPORT PERIOD: 1/1/2011 through 6/30/2011

Section 63.168(d) – VALVES
Phase III monitoring frequency. As of 6/30/2011, this process unit had 0% leaking valves, calculated in compliance with section 63.168(e) definition of percent leaking valves as a rolling average of two consecutive annual monitoring periods. As a result, the 2011 monitoring frequency will stay at once per year (March) as specified in paragraph (d) for process units with less than 0.5% leaking valves.

(i)	JAN	FEB	MAR	APR	MAY	JUN
Number of leaking Gas/Vapor & LL service valves detected	0	0	0	0	0	0
Percent of leaking Gas/Vapor & LL service valves	0	0	0	0	0	0
Number of Gas/Vapor & LL service valves monitored	0	0	0	0	0	0

(ii) 0 = The number of leaking Gas/Vapor & LL service valves that were not repaired within 15 days
0 = The number of non-repairable Gas/Vapor & LL service valves included in the above quantity

Section 63.163 – PUMPS
Phase III requirements apply.

(iii)	JAN	FEB	MAR	APR	MAY	JUN
The number of leaking LL service pumps detected	0	0	0	0	0	0
The percent of leaking pumps	0	0	0	0	0	0
The number of pumps monitored	5	5	5	5	5	5
(iv)Number of leaking pumps not repaired within 15 days	0	0	0	0	0	0

Section 63.164 – COMPRESSORS (Not applicable)

(v) 0 = The number of leaking compressors detected

(vi) ---- = The number of leaking compressors that were not repaired within 15 days

Section 63.173 – AGITATORS (Not applicable)

(vii) 0 = The number of leaking Gas/Vapor & LL service agitators detected

(viii) ---- = The number of leaking Gas/Vapor & LL service agitators not repaired within 15 days

Section 63.174 – CONNECTORS

Zero percent leaking connectors found in first quarter 1996 and in first quarter 1998. Once every four years is the monitoring frequency under Phase III. Re-monitoring of connectors, required in the first quarter 2010 was performed, and 0% leaking connectors were found. The next monitoring year will be in 2014. The alternative allowed in section 63.174 (c)(1)(ii) applies to these components.

(ix) 0 = The number of leaking Gas/Vapor & LL service connectors detected
0 = The percent of leaking Gas/Vapor & LL service connectors
252 = The number of Gas/Vapor & LL service connectors monitored including 27 difficult to monitor.

(xi) 0 = The number of leaking Gas/Vapor & LL service connectors not repaired within 15 days
0 = The number of non-repairable Gas/Vapor & LL service connectors included in the above quantity.

(xiii) **EXPLAIN DELAY OF REPAIRS, IF ANY, AND WHY PROCESS UNIT SHUTDOWN WAS TECHNICALLY INFEASIBLE, APPROPRIATE.**

(xiv) **RESULTS OF MONITORING TO SHOW COMPLIANCE WITH SECTIONS 63.164(I), 63.165(A), AND 63.172(F)**

- 63.164 – Not applicable.
- 63.165(a) "Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with an instrument reading of less than 500 parts per million above background…" Zero were found leaking.
- 63.167 – All 304 open-ended lines are provided caps or plugs. Compliance is verified by periodic audits using the cap and plug location list. An audit on Sep 21 found all required caps in place.
- 63.172(f) – Annual Closed Vent System monitoring was done as scheduled in Nov 2008. No leaks were detected - see next paragraph for count.

WAS ANY ANNUAL MONITORING COMPLETED THIS PERIOD?
Yes, the annual connector monitoring was completed in the first half of 2010.

(xv) **HAS THE PLANT INITIATED MONTHLY MONITORING OF VALVES OR QIP FOR VALVES OR PUMPS.**
Not applicable

(xvi) **DOES THE PLANT WISH TO CHANGE CONNECTOR MONITORING ALTERNATIVES**
Not applicable

(xvii) **WERE THERE ANY PROCESS UNIT SHUTDOWNS DURING THIS REPORTING PERIOD? (IF SO LIST DATES.)**
Yes, the Diamines Unit was down in the first half of 2010 during the following dates: January 10 – 12, February 6, February 14, March 17 – 29, May 2 – 10, June 4 – 5 and June 17.

Toni L. Martin, Environmental Coordinator

July 7, 2011
Date

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DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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Air/Toxics & Inspection
Coordination Branch
6EN-A

DuPont
Performance Elastomers

July 13, 2011

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, La. 70821-4312

CERTIFIED MAIL NO. 7010 1060 0000 8360 3599

Re: DuPont Performance Elastomers L.L.C. – Pontchartrain Site – AI#38806
Polymers and Resins Group I MACT (40 CFR Part 63, Subpart U)
Periodic Report (non-LDAR) for November 16, 2010 through May 15, 2011

Enclosed is the non-equipment leak Periodic Report under 40 CFR Part 63, Subpart U, of the Polymers & Resins Group I MACT regulation, for the DuPont Performance Elastomers (DPE) Neoprene Plant located in LaPlace, Louisiana. As required by 40 CFR §63.506(e)(6)(i), this non-equipment leak Periodic Report covers the 6-month period beginning November 16, 2010 and ending on May 15, 2011.

It is our understanding that an affected source is required to submit periodic reports for equipment leaks following a separate schedule from the periodic reports covering all other requirements of the Polymers & Resins Group I MACT standard. Semi-annual LDAR reports are being submitted to your office as required under the referenced regulations.

A detailed analysis of the Periodic Report elements in 40 CFR §63.506(e)(6) is attached. Those applicable and not applicable (N/A) to DPE's Neoprene Unit are noted.

If you have any questions or need additional information, you can contact me at (985) 536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P. E.
Environmental Technical Associate

Enclosures

cc: Mr. David Garcia
U.S. EPA Region 6
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7010 1060 0000 8360 3605

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Air/Toxics & Inspection
Coordination Branch
6EN-A

DUPONT PERFORMANCE ELASTOMERS L.L.C.

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

TITLE V OPERATING PERMIT NO. 2249-V6

P&R I MACT – PERIODIC REPORT (non-LDAR)

STARTING DATE: NOVEMBER 16, 2010

ENDING DATE: MAY 15, 2011

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Walter L. Glenn
Responsible Official's Title	Plant Manager
Signature	Walter L. Glenn
Date Signed	July 12, 2011

Analysis of Periodic Reporting Requirement of Polymers & Resins Group I MACT, 40 CFR Part 63, Subpart U, §63.506(e)(6)
Periodic Report (non-LDAR) for DuPont Performance Elastomers L.L.C.
Pontchartrain Site, LaPlace, Louisiana
Reporting period beginning on November 16, 2010 and ending on May 15, 2011

40 CFR §63.506(e)(6)(i). Frequency of reporting and time period covered.

This paragraph refers to paragraphs (e)(6)(xi) and (e)(6)(xii) of §63.506 as potentially applicable exceptions to the requirement to submit semiannual Periodic Reports. Paragraph (e)(6)(xi) addresses emission points included in an emissions average. The affected Elastomer Product Process Unit (EPPU) is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in paragraph (e)(6)(xi) is not applicable (N/A).

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with these limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had one instance when a recovery device had an excursion, as defined in §63.505(g).

The second requirement concerning quarterly reporting under paragraph (e)(6)(xii) relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(2). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

In the absence of a requirement to submit quarterly reports, Periodic Reports are required semiannually by paragraph (e)(6)(i). The first report was required to be submitted no later than 240 days after the date the Notification of Compliance Status was due. The Notification of Compliance Status submittal deadline was November 16, 2001. The date 240 days after the November 16, 2001 date is July 14, 2002. In addition, the first Periodic Report was required to address the six-month period beginning on the date that the Notification of Compliance Status was due. Periodic Report #1 (non-LDAR) thus covered the reporting period beginning on November 16, 2001, and ending on May 15, 2002. This Periodic Report covers the six-month reporting period, beginning on November 16, 2010 and ending on May 15, 2011.

40 CFR §63.506(e)(6)(ii). Content of Periodic Reports under certain conditions.

If during the reporting period, the affected source experienced none of the compliance exceptions or activities identified in §§63.506(e)(6)(iii) through (e)(6)(ix), then the Periodic Report is to take the short form. In this case, the Periodic Report should contain a statement that there were no compliance exceptions as specified in paragraphs (e)(6)(iii) through (e)(6)(ix) of §63.506 for the six-month period covered by the report, and that none of the activities specified in those same paragraphs occurred during the same six-month period.

40 CFR §63.506(e)(6)(iii). Content of Periodic Reports under all other conditions.

This paragraph references specific information to be provided in the Periodic Report if the conditions in the preceding paragraph (e)(6)(ii) were not met during the reporting period. The paragraph applies to affected sources subject to §63.484 through 63.501 for any emission point. This equates to affected sources subject to Subpart U and having specific applicable requirements for any combination of storage vessels, continuous front-end process vents, batch front-end process vents, back-end process vents, or process wastewater. The affected EPPU identified its specific applicable requirements in its Notification of Compliance Status submittal.

The affected EPPU notes that §63.501(a) identifies the applicable requirements for maintenance wastewater as §63.105(a). The applicable requirements for maintenance wastewater do not include any requirement to report information in the Periodic Reports required by §63.506(e)(6).

40 CFR §63.506(e)(6)(iii)(A). Cross-references to specific reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Cross-reference (40 CFR)	Required Information and Applicability
§63.122(a)(4) for storage vessels	Relates to Group 1 storage vessels (N/A)
§§63.117(a)(3), 63.118(f), and 63.485(s)(5) for continuous front-end process vents	§63.117(a)(3) relates to TRE determinations or performance tests conducted after the Notification of Compliance Status (NoCS) has been submitted. - The affected EPPU had no process changes during this reporting period that required a recalculation of the TRE index value. - The affected EPPU conducted no performance tests during this reporting period. §63.118(f)(1) relates to daily average values of monitored parameters for all operating days when daily average values recorded were outside the levels established in the NoCS or the Title V operating permit - The affected EPPU had no such days during this reporting period. §63.118(f)(2) relates to Group 1 emission points with excursions caused by insufficient monitoring data (N/A). §63.118(f)(3) relates to the times and durations of periods recorded when the vent stream is diverted from its control device through a bypass line (N/A). §63.118(f)(4) relates to periods recorded when the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line valve was checked out (N/A). §63.118(f)(5) relates to periods when all pilot flames of a flare were absent (N/A). §63.118(f)(6) relates to carbon bed regeneration cycles with recorded parameters outside the levels established in the NoCS or the Title V operating permit (N/A). §63.485(s)(5) relates to Group 1 continuous front-end process vents controlled using an internal combustion engine (N/A).
§63.492 for batch front-end process vents and aggregate batch vent streams	§63.492(a) relates to information required in the NoCS (N/A). §63.492(b) relates to process changes causing a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. §63.492(c) relates to process changes that – - cause a Group 2 batch front-end process vent with annual emissions less than 11,800 kg/year to have annual emissions greater than or equal to 11,800 kg/year but not changing the Group 2 status of the batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. - or require redetermination of the batch mass input limitation (N/A). §63.492(d) specifies process changes for which reporting is not required (N/A).

Cross-reference (40 CFR)	Required Information and Applicability
§63.492 for batch front-end process vents and aggregate batch vent streams (continued)	§63.492(e) relates to information required in the Precompliance Report for alternative control devices or alternative monitoring parameters (N/A). §63.492(f) relates to affected sources required to monitor bypass lines around control devices per §63.489(d) (N/A).
§63.499 for back-end process operations	The affected EPPU has no back-end process requirements per §63.494(a)(4) (N/A).
§63.104(f)(2) for heat exchange systems	Addresses reporting requirements if the delay-of-repair provisions are invoked (N/A). Note: The affected EPPU has heat exchange systems meeting the condition specified in §63.104(a)(1)—that the heat exchange systems are operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side. Accordingly, the requirements of §63.104(a)(1) do not apply to the affected EPPU.
§63.146(c) – (g) for process wastewater	§63.146(c) relates to waste management units that receive, manage, or treat Group 1 process wastewater stream(s) or residual(s) removed from Group 1 process wastewater stream(s) (N/A). §63.146(d) relates to treatment processes for Group 1 process wastewater streams and/or residuals removed from Group 1 wastewater streams (N/A). §63.146(e) relates to control devices for organic HAP emissions from Group 1 process wastewater streams (N/A). §63.146(f) relates to owners or operators who have obtained approval to use an alternative treatment process or control device or to monitor a set of alternative parameters and therefore have alternate reporting requirements (N/A). §63.146(g) relates to extensions of time to empty and remove a Group 1 process wastewater tank equipped with a floating roof from service for inspection or repairs to the floating roof per §63.133(e)(2) or for control equipment repair per §63.133(h) (N/A)

40 CFR §63.506(e)(6)(iii)(B). Reporting requirements for excursions.

This paragraph requires the owner or operator of the affected EPPU to report the daily average values or batch cycle daily average values of monitored parameters for each excursion.

Excursions are defined by paragraphs (g) and (h) of §63.505. As noted above, §63.505(h) does not apply to the affected EPPU but §63.505(g) does. In addition, for excursions caused by lack of monitoring data, the owner or operator is to specify the start time and duration of each period when monitoring data were not collected.

On January 24, 2011, from 11:58 until 15:09, the brine temperature on the kettles common vent header was above the permitted limit. After performing maintenance work on the common header, the valve on the brine line remained closed and brine did not flow through the condenser for this period of time.

40 CFR §63.506(e)(6)(iii)(C). [Reserved.]

40 CFR §63.506(e)(6)(iii)(D). Additional reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Citation (40 CFR §63.506)	Required Information and Applicability
(e)(6)(iii)(D)(*1*)	Supplements to the Emissions Averaging Plan, if any, per paragraph (e)(4)(iii) (N/A).
(e)(6)(iii)(D)(*2*)	Notification if a process change is made that changes the group status of any emission point from Group 2 to Group 1. - The affected EPPU had no such process changes during the reporting period.
(e)(6)(iii)(D)(*3*)	Notification of addition of one or more emission points or EPPUs to the affected source, with description and notification of the group status of the additional emission point or of all emission points in the EPPU. - The affected EPPU added no emission points or EPPUs during the reporting period.
(e)(6)(iii)(D)(*4*)	For EPPUs producing styrene-butadiene rubber by an emulsion process, notification of changes in standard operating procedures affecting carbon disulfide concentration in crumb dryer exhaust (N/A).
(e)(6)(iii)(D)(*5*)	Changes in the identity of the treatment facility or transferee receiving process wastewater streams for treatment pursuant to §63.132(g) (N/A).

40 CFR §63.506(e)(6)(iii)(E). Start-up, shutdown, and malfunction reports.

[Please note that the U.S. Environmental Protection Agency amended 40 CFR §63.10(d)(5)(i) and the final rule was published in the Federal Register on May 30, 2003 (68 FR 32586). This notice requires the submittal of a Shutdown and Malfunction Report with the Periodic Reports. The Neoprene Unit has procedures in place that meet the requirements of this regulation. Since this facility does not have a Group 1 source, it is our understanding, based on 40 CFR §63.506(b)(i), that a Shutdown and Malfunction Report is not required.]

This paragraph refers to the information required by paragraph (b)(1)(ii) of §63.506. In turn, §63.506(b)(1)(ii) requires semiannual start-up, shutdown and malfunction reports to be submitted on the same schedule as the non-LDAR Periodic Reports and to include the information specified in §63.10(d)(5)(i).

The affected EPPU notes, however, that paragraph (b)(1) of 40 CFR §63.506 does not require the owner or operator of an affected source to include Group 2 emission points in the written start-up, shutdown and malfunction plan unless the Group 2 emission points are included in an emissions average. Further, this paragraph limits the start-up, shutdown and malfunction plan requirement to control devices for equipment leaks and makes it optional for other equipment. The affected EPPU has no Group 1 emission points and no control devices for equipment leaks. Accordingly, the affected EPPU asserts that it is not required to develop and implement a written start-up, shutdown and malfunction plan pursuant to §63.506(b)(1).

Furthermore, §63.506(b)(1) states in its final sentence that reports related to the plan shall be submitted as specified in paragraph (b)(1)(ii) of §63.506. If the affected EPPU is not required by §63.506(b)(1) to have a written start-up, shutdown and malfunction plan, the affected EPPU asserts that it is also not required to submit reports related to that plan.

40 CFR §63.506(e)(6)(iv). Batch mass input limitation.

This paragraph requires the owner or operator to report once per year (i.e., in every other Periodic Report) the mass of HAPs or material input to the batch unit operation during the 12-month period covered by the current and previous Periodic Reports. In addition, the owner or operator must state whether the batch front-end process vent subject to the batch mass input limitation complied with the batch mass input limitation.

The affected EPPU indicated in its Notification of Compliance Status submittal that its determination of the group status of its set of batch front-end process vents was based on annualized emissions from maximum production of its single highest-HAP recipe. The result of this determination was that the affected EPPU's batch front-end process vents are Group 2. Consequently, the affected EPPU elected to comply with 40 CFR §63.487(g)(4) and §63.487(h). This compliance option does not require the affected EPPU to establish a batch mass input limitation. The affected EPPU made no recipe

changes during the reporting period that changed the identity or the composition of the single highest-HAP recipe on which this determination was based.

The election of the affected EPPU to comply with §63.487(h) for its batch front-end process vents invokes the reporting requirements of paragraphs (a)(5), (a)(6), and (b) of §63.492. The information in paragraphs (a)(5) and (a)(6) was included in the affected EPPU's Notification of Compliance Status submitted November 16, 2001, and is not required to be included in Periodic Reports.

§63.492(b) relates to process changes that cause a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. As noted in the table presented in the discussion above of reporting requirements under 40 CFR §63.506(e)(6)(iii)(A), the affected EPPU made no process changes during the reporting period that caused a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. Therefore, this Periodic Report is not required to include a notification and description of any process changes [as specified in 40 CFR §63.492(b).]

<u>40 CFR §63.506(e)(6)(v)</u>. Reporting of performance tests.

This paragraph specifies the information required for performance tests conducted during the reporting period. The affected EPPU did not conduct any performance tests during the period covered by this Periodic Report.

<u>40 CFR §63.506(e)(6)(vi)</u>. Change in primary product.

This paragraph requires notification of any change in the primary product of the affected EPPU. The affected EPPU did not change its primary product during the period covered by this Periodic Report.

<u>40 CFR §63.506(e)(6)(vii)</u>. Changes in predominant use determinations for storage tanks assigned to an affected EPPU.

The storage tanks at the affected EPPU did not require a predominant use determination. Therefore, this reporting requirement is not applicable (N/A).

<u>40 CFR §63.506(e)(6)(viii)</u>. Changes in predominant use determinations for recovery operations equipment assigned to an affected EPPU.

The recovery operations equipment at the affected EPPU did not require a predominant use determination. Therefore, this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(ix). Reduced recordkeeping program.

This paragraph requires notification of the owners or operator's election to comply with the recordkeeping provisions of §63.506(h)(1) as an alternative to the continuous operating parameter monitoring and recordkeeping provisions of Subpart U. The affected EPPU has made no such election, and therefore this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(x). Further reduced recordkeeping provisions.

This paragraph requires notification of the owner or operator's election not to retain daily average or batch cycle daily average values as a further reduction in recordkeeping for monitored parameters that would otherwise be subject to the Subpart U provisions for continuous operating parameter monitoring and recordkeeping, as provided by §63.506(h)(2). The affected EPPU notes that owners or operators wishing to avail themselves of this option must first comply with §63.506(h)(1) for at least six months with no excursions. The affected EPPU has not elected to comply with §63.506(h)(1). Accordingly, the affected EPPU is not eligible for this alternative, and this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(xi). Quarterly reporting requirements for emission points included in an emissions average.

The affected EPPU is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in this paragraph does not apply.

40 CFR §63.506(e)(6)(xii). Quarterly reporting requirements for emission points or EPPUs not included in an emissions average.

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has had more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with the limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had one excursion as defined by this section.

The second requirement under paragraph (e)(6)(xii) concerning quarterly reporting relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(2). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

AI/AI/CO 1100 2532 9491

DuPont Performance Elastomers L.L.C.
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

804 LA V.10

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6EN-A

DuPont
Performance Elastomers

July 13, 2011

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7010 1060 0000 8360 3568

Re: DuPont Performance Elastomers L.L.C. – Pontchartrain Site – AI#38806
40 CFR Part 63, Subpart FFFF
Periodic Report – ACR Unit

Enclosed is the sixth Periodic Report under 40 CFR Part 63, Subpart FFFF, the MON MACT regulation, for the DuPont Performance Elastomers ACR Unit located in LaPlace, Louisiana. This Periodic Report covers the period of January 1 to June 30, 2011.

If you have any questions or comments, you can contact me at 985-536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

cc: Mr. David Garcia
U.S. EPA Region 6
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7010 1060 0000 8360 3575

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DUPONT PERFORMANCE ELASTOMERS L.L.C.

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

ACR UNIT

40 CFR Part 63, Subpart FFFF – PERIODIC REPORT (non-LDAR)

STARTING DATE: JANUARY 1, 2011

ENDING DATE: JUNE 30, 2011

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Walter L. Glenn, Plant Manager
Signature	Walter L. Glenn
Date Signed	7-12-2011

Periodic Report for the ACR Unit
40 CFR Part 63, Subpart FFFF, §63.2520(e)
DuPont Performance Elastomers L.L.C.
Pontchartrain Site, LaPlace, Louisiana

40 CFR §63.2520(e)(1) Company Name and Address

DuPont Performance Elastomers
560 Highway 44
LaPlace, La. 70068
Contact – Doris B. Grego
Phone – 985-536-5437
e-mail – doris.b.grego@usa.dupont.com

40 CFR §63.2520(e)(2) Statement by Responsible Official

Included with this submittal.

40 CFR §63.2520(e)(3) Reporting Period

Reporting period beginning on January 1, 2011 and ending on June 30, 2011.

40 CFR §63.2520(e)(4) SSM Malfunctions

There were no SSM in which excess emissions occurred during this reporting period.

40 CFR §63.2520(e)(5) Deviations

No deviations from the permitted limits or permit conditions were experienced during this reporting period.

40 CFR §63.2520(e)(6) CEMS

This facility is not required to have CEMs.

40 CFR §63.2520(e)(7) Operating Scenarios

There were no new operating scenarios since the notification of compliance status was submitted.

40 CFR §63.2520(e)(8) Process Unit Groups

No new process units were added to this facility.

40 CFR §63.2520(e)(9) Other Records

Heat Exchange Systems (63.104(f)(2): This facility does not have heat exchange systems that meet this definition.

Wastewater (63.146(c), (d) and (e): This facility does not have wastewater streams which contain listed HAPs.

Equipment Leaks: If complying with Subpart H, submit the information listed in §63.182(d). If complying with Subpart UU, submit the information listed in §63.1039(b). This facility has selected to comply with Subpart H. The information required under §63.182(d) is included with this report (pages 4 and 5).

Closed Vent Systems and Control Devices: This facility does not have close vent systems.

Floating Roof Tanks: This facility does not have floating roof tanks.

40 CFR §63.2520(e)(10) Notification of Process Change

There were no process changes to this facility during this reporting period that meet the requirements of this subpart.

2011 FIRST SEMI-ANNUAL REPORT

[Information required under 40 CFR §502(i) AND §63.182(d), SUBPART H & I]

1. **NAME OF FACILITY:** DuPont Performance Elastomers

   PROCESS UNIT: ACR Manufacturing Unit

2. **SUMMARY INFORMATION**
[40 CFR §63.182 (d)(2)]

		2011					
		JAN.	FEB.	MAR.	APR.	MAY	JUN.
(i)	No. valves found leaking	0	0	0	0	-	0
	Percent valves leaking	0	0	0	0	-	0
	Total no. monitored	53	115	111	53	-	171
(ii)	No. leaking valves not repaired	0	0	0	0	-	0
	No. valves not repairable	0	0	0	0	-	0
(iii)	No. pumps found leaking	0	0	0	0	0	0
	Percent leaking pumps	0	0	0	0	0	0
	Total no. monitored	19	19	19	19	19	19
(iv)	No. leaking pumps not repaired	0	0	0	0	0	0
(v)	No. compressors found leaking	NA	NA	NA	NA	NA	NA
(vi)	No. leaking compressors not repaired	NA	NA	NA	NA	NA	NA
(vii)	No. agitators found leaking	NA	NA	NA	NA	NA	NA
(viii)	No. leaking agitators not repaired	NA	NA	NA	NA	NA	NA
(ix)	No. leaking connectors	-	-	-	-	-	-
	Percent connectors leaking	-	-	-	-	-	-
	Total no. monitored	-	-	-	-	-	-

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2011					
		JAN.	FEB.	MAR.	APR.	MAY	JUN.
(x)	Reserved						
(xi)	No. leaking connectors not repaired	-	-	-	-	-	-
	No. connectors not repairable	-	-	-	-	-	-

(xii) Reserved

(xiii) Explain delay of repairs, if any, and why process unit shutdown was technically infeasible, if appropriate.

None.

(xiv) Results of monitoring to comply with:

63.164 (i) – This unit does not have compressors in organic service.

63.165 (a) –This unit does not have pressure relief devices in organic service.

63.172 (f) – Not applicable

(xv) Not applicable

(xvi) Connectors Monitoring Alternatives – Since the implementation of the fugitive emission program, this unit has used the monitoring alternative described under 63.174(c)(1)(ii).

(xvii) Not applicable

A1/A1/CO 110000597131

DUPONT

DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

4/3/8/4

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Coordination Branch
6EN-A

Certified Mail No. 7011 0470 0001 1307 2499

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

January 10, 2012

RE: NESHAP Y Benzene Storage Tank Quarterly Report
Period: Oct 1, 2011 - Dec 31, 2011
Facility: DuPont DPT in LaPlace, LA

On behalf of E. I. DuPont de Nemours and Co., Inc., I am submitting the fourth quarter 2011 for Flammable Vent Header Flare #1 (source 1500-34) and Flammable Vent Header Flare #2 (source 1500-66). This report is required under 40 CFR 61.275(e)(1). These flares serve as the emission control devices for the Benzene Storage Tank in the Diamines Unit. The tank is covered under Subpart Y of the NESHAP.

As required by the referenced regulation, this report includes a list of the time and duration of emission control system upsets or malfunctions. A copy of this report is also being sent to the Louisiana Department of Environmental Quality. If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
Environmental Coordinator

Enclosures:

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
FLARE OUTAGE REPORT FOR BENZENE NESHAP STORAGE TANK

Report Period
October 1, 2011 through December 31, 2011

I certify that, to the best of my knowledge, the information submitted in the report is accurate.

Signature: Walter L. Glenn Date 1-9-2012
Walter L. Glenn, Plant Manager

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR BENZENE NESHAPS
QUARTERLY REPORT OF EMISSION CONTROL
SYSTEM UPSETS/MALFUNCTIONS
PART 61.275 (e)(1)(2)(3)

FOURTH QUARTER 2011

DATE	TIME START	TIME STOP	TIME LENGTH	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	ESTIMATED BENZENE RELEASE (LB)
There were no upsets or malfunctions of the Flammable Vent Header Flare #1 (1500-34) during the fourth quarter of 2011							
There were no upsets or malfunctions of the Flammable Vent Header Flare #2 (1500-66) during the fourth quarter of 2011							

L804
V11
434874

DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

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JAN 23
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Coordination Branch
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Certified Mail: 7010 3090 0002 7735 0228

FRS110000597131
AI/AI/CO

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

January 10, 2012

Re: 2010 Annual Title V Certification for LA Permit Number 2298-V1, DuPont BDU Unit
LA Agency Interest Number: 1101

As required under 40 CFR 70.6(c)(5)(iv), E.I. DuPont de Nemours and Company, Inc. is submitting the annual certification for the Business Development Unit (BDU) unit located in LaPlace, Louisiana. It covers from January 1, 2011 through December 31, 2011.

If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
Environmental Coordinator

Enclosures

cc: LDEQ Office of Environmental Compliance, P.O. Box 4312, Baton Rouge, LA 70821-4312
LDEQ Southeast Regional Office, 201 Evans Road, Suite 420, New Orleans, LA 70123-5230

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 1)

Applicable Reporting Period: 01/01/11 through 12/31/11
mm/dd/yy mm/dd/yy

Company and Facility Identification					
Permit Number	2298-V1	Parish	St. John the Baptist	Date Permit Issued	10/26/10
Company Name	E. I. DuPont de Nemours and Company, Inc				
Facility Name	Pontchartrain Site			Agency Interest Number	1101
Mailing Address	586 Highway 44				
City	LaPlace	State	LA	Zip Code	70068-6912
Contact Person	Toni L. Martin	Phone #	985-536-5241	Fax #	985-536-5675
Principal Facility Product/Business	Facility = Business Development Unit (BDU) Product = Isophorone Diamine				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 1-9-2012		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 2)

Title V Permit Number: 2298-V1 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: BDU at Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier [A]	Permit Condition Number [B]	Applicable Compliance Requirement (Include Rule Citation) [C]	Method(s) or Other Means For Determining Compliance Status [D]	Permit Required Monitoring Frequency [E]	Compliance Status - See Guidance for Certification Part 2 [F]
EQT075 (1500-56C) BDU Tk Scrubber	2 - 5	Record water flowrate to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet value	Once per shift	Continuous The BDU system is in an idling status as of May 27, 2010.
EQT080 (3-90) Lo Pres Scrubber	8 - 11	Record water flowrate to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet value	Once per shift	Continuous The BDU system is in an idling status as of May 27, 2010. All equipment venting to the Low Pressure Scrubber has been cleared and cleaned.
EQT083 (4-90) Spec Tk Scrubber	15 - 16	Confirm water flow to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet notation	Once per shift	Intermittent The BDU system is in an idling status as of May 27, 2010. All equipment venting to the Specialty Tank Scrubber has been cleared and cleaned as of December 19, 2011.
EQT088 (1-94) Hi Pres Scrubber	17 - 18	Confirm scrubber is operating correctly [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet notation	Once per shift	Continuous The BDU system is in an idling status as of May 27, 2010. All equipment venting to the High Pressure Scrubber has been cleared and cleaned.

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting

Title V Permit Number: 2298-V1 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: BDU at Pontchartrain Site **AI Number:** 1101

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	No.	1st Q 2011 Dev Rep not sent since No deviations to report 1st H 2011 Dev Rep sent to LDEQ cert mail postmarked July 28, 2011 7009 3410 0000 0921 5652 (BR) 7009 3410 0000 0921 5569 (NO) no 2nd Q deviations to report 3rd Q 2011 Dev Rep not sent since No deviations to report. 2nd H 2011 Dev Rep sent to LDEQ cert mail postmarked Jan 11, 2012 7010 3090 0002 7735 0204 (BR) 7010 3090 0002 7735 0198 (NO) no 4th Q deviations to report

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must minimally contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4)

Deviation Summary Report

Title V Permit Number: 2298-V1 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: BDU at Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier	Pollutant	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT075 (1500-56C) BDU Tk Scrubber	Ammonia VOC Isophorone	2 - 5	Record water flowrate to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet value	Once per shift
EQT080 (3-90) Lo Pres Scrubber	Ammonia VOC	8 - 11	Record water flowrate to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet value	Once per shift
EQT083 (4-90) Spec Tk Scrubber	VOC	15 - 16	Confirm water flow to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet notation	Once per shift
EQT088 (1-94) Hi Pres Scrubber	Ammonia VOC	17 - 18	Confirm scrubber is operating correctly [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet notation	Once per shift

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4 continued)

Deviation Summary Report

Title V Permit Number: 2298-V1 Company Name: E. I. DuPont de Nemours and Company, Inc

Facility Name: BDU at Pontchartrain Site AI Number: 1101

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
						No Deviations in 1Q11	
						No Deviations in 2Q11	
						No Deviations in 3Q11	
						No Deviations in 4Q11	

PERMIT NO: 2298-V1 Annual Compliance Certification

Applicable Reporting Period: January 1, 2011 through December 31, 2011

Specific Reqmnt	Citation	Emission Point	Requirement	Status	Compliant
1 7	LAC 33:III. 2107	EQT074 Railcar Load EQT078 Truck Load	Throughput recordkeeping by electronic or hard copy daily.	Records are maintained on site	Yes
2 26 3 28 8 29 13 30 14 31 19 32 20 33 21 34 22 35 23 36 24	LAC 33:III. 2115.K	EQT075 BDU Tk Scrub EQT080 Lo Pres Scrub EQT081 Lo Blr Col EQT082 Prod Col EQT083 Spec Tk Scrub EQT088 Hi Pres Scrub EQT089 Amination Rx EQT090 Hydrogen Rx EQT091 NH3 Rec Col EQT092 Unscrub Vent	Equipment/operating data recordkeeping to demonstrate criteria met. Records to demonstrate that VOC emissions are less than 100 lbs in any 24 hour continuous period as specified in LAC 33.III.2115.K.4	Records are maintained on site	Yes
3 4 5 6	LAC 33:III. 501.C.6	EQT075 BDU Tk Scrub	Flowrate >= 0.5 gpm, monitor and record once per shift, submit hrs operated out of range by 31 March for preceding year.	Records are maintained on site	Yes
15 16 17 18	LAC 33:III. 501.C.6	EQT080 Lo Pres Scrub	Flowrate >= 0.2 gpm if dp<=15 in or >= 2 gpm if dp > 15 in water pres, monitor and record once per shift, submit hrs operated out of range by 31 March for preceding year.	Records are maintained on site	Yes. All equipment venting to the Low Pressure Scrubber has been cleared and cleaned.
25	LAC 33:III. 501.C.6	EQT083 Spec Tk Scrub	inspect once per shift to confirm functioning properly, check fresh water fed to seal pot, maintain record	Records are maintained on site	Yes. All equipment venting to the Low Pressure Scrubber has been cleared and cleaned as of 12/19/2011.
27	LAC 33:III. 501.C.6	EQT088 Hi Pres Scrub	inspect once per shift to confirm functioning properly, water re-circulating thru scrubber, maintain record	Records are maintained on site	Yes. All equipment venting to the High Pressure Scrubber has been cleared and cleaned.
39	LAC 33:III. 2111	FUG002 Fugitive Emis	mech seals or equiv on rotary pumps and compressors with true VP >= 1.5 psia	Records are maintained on site	Yes
45 46 47 50	LAC III. 1103 1109B 1303.B 2901.G	GRP010 Other	prohibits smoke across road, prohibits outdoor burning, prohibits particul across road prohibits odors >=6 butanol eq	procedures, routine patrols	Yes
48	LAC III. 2113.A.1-5	GRP010 Other	maintain best housekeeping and maintenance practices to reduce quan of organic emis	procedures, routine patrols	Yes
49	LAC 33:III. 219	GRP010 Other	pay prescribed application fees or annual fees <=90 days due	procedures	Yes

PERMIT NO: 2298-V1 Annual Compliance Certification
Applicable Reporting Period: January 1, 2011 through December 31, 2011

30 31 33 34 52	LAC 33:III. 501.C.6	GRP010 Other	-total VOC <= 1.528 tpy -ammonia <=3.34 tpy -ethylene glycol <=0.001 tpy -isophorone <= 0.001 tpy -may produce similar diam as long as not exceed permit limit	Reports are maintained on site	Yes
54 55 56 57	LAC 33:III. 5105.A.1 5105.A.2 5105.A.3 5105.A.4	GRP010 Other	don't construct new stat source no violation of ambient air std nothing to conceal emission keep records, notify, report	procedures, routine patrols	Yes
59 58 60 61 62 63 64	LAC 33:III. 5107.A.2 5107.A.2 5107.B.1 5107.B.2 5107.B.3 5107.B.4 5107.B.5	GRP010 Other	submit ann emission by 31Mar submit annual certification emerg = Public Safety < 1 hr bypass = Compliance <24 hr >permit = Compliance <24 hrs written follow-up <= 7 days report SRV, fail, bypass qty	procedures	Yes
65	LAC 33:III. 5109.C	GRP010 Other	SOP to ensure compliance with applic std is maintained	procedures	Yes
66-67	LAC 33:III. 5113	GRP010 Other	Emission Test requirements	procedures	Yes
69-72	LAC 33:III. 5611	GRP010 Other	Preplanned abatement strategy when alert, warning, emerg	procedures	Yes
73-74	40 CFR 68	GRP010 Other	Hazard Assessment	procedures	Yes
75-76	LAC 33:III. 5911	GRP010 Other	Risk Management registration submit amended reg if change	procedures	Yes
77	LAC 33:III. 919	GRP010 Other	Submit EIS by 31 March for preceding year.	procedures	Yes
78	LAC 33:III. 927	GRP010 Other	Report unauthorized discharge of any air pollutant	procedures	Yes
	NESHAP FF 40 CFR 61 61.342 61.355(c) 61.357(a)	Facility	Submit initial report. Maintain records for each waste stream subject to this subpart	The initial report was submitted in 1993. The records are maintained onsite.	Yes
	40 CFR 70. 5(a)(1)(iii) 6(a)(3)(iii) 6(c)(5)(iv)	GRP010 Other	TVpermit renewal >=180 days report TV deviations quarterly (can combine w semi annual) certify TVcompliance annually	procedures	Yes

A1/A1/CO

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V11

DUPONT

DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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FEB 27 2012

Air/Toxics & Inspection
Coordination Branch
6EN-A

February 23, 2012

Dept. of Environmental Quality
Office of Environmental Compliance
Title V Program
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7010 1870 0001 2248 2740

Re: 2011 – Annual Certifications
Agency Interest No. 38806
Permit Nos. 3000-V3, 2249-V6, 206-V2

As required under 40 CFR 70.6(c)(5)(iv), DuPont is submitting the 2011 Annual Certification of Compliance, Second Semiannual Report for 2011 and additional monitoring data required under the referenced permits. A line by line certification statement is available at our site for review.

Chloroprene Unit, Permit No. 3000-V3
Neoprene Unit, Permit No. 2249-V6
HCl Recovery Unit, Permit No. 206-V2

If you have any questions or need additional information you can contact me at (985) 536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

cc: Environmental Protection Agency
Air Enforcement Section
1445 Ross Avenue
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7010 1870 0001 2248 2757

ATTACHMENT 1
2011 ANNUAL COMPLIANCE CERTIFICATIONS

Chloroprene Unit, Permit No. 3000-V3
Neoprene Unit, Permit No. 2249-V6
HCl Recovery Unit, Permit No. 206-V2

Louisiana DEQ Title V Annual Compliance Certification Form
DuPont Performance Elastomers, Chloroprene Unit

(Certification Part 1)

Applicable Reporting Period: 01/01/11 (mm/dd/yy) to 12/31/11 (mm/dd/yy)

Company and Facility Identification					
Permit Number	3000-V3	Parish	St. John the Baptist	Date Permit Issued	Jan. 4, 2010
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 2-21-2012		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting

Title V Permit Number: 3000-V3 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	Yes	Attached are copies of the two 2011 semiannual reports. All deviations were included with these reports.

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

A line by line certification statement is available at our site for review.

Louisiana DEQ Title V Annual Compliance Certification Form
DuPont Performance Elastomers, Neoprene Unit
(Certification Part 1)

Applicable Reporting Period: 01/01/11 (mm/dd/yy) to 12/31/11 (mm/dd/yy)

Company and Facility Identification					
Permit Number	2249-V6	Parish	St. John the Baptist	Date Permit Issued	June 16, 2009
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L Glenn	2-21-2012	
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manger		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting

Title V Permit Number: 2249-V6 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	Yes	Attached are copies of the two 2011 semiannual reports. One permit deviation was reported during the first semiannual report.

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

A line by line certification statement is available at our site for review.

Louisiana DEQ Title V Annual Compliance Certification Form
DuPont Performance Elastomers, HCl Unit
(Certification Part 1)

Applicable Reporting Period: 01/01/11 (mm/dd/yy) to 12/31/11 (mm/dd/yy)

Company and Facility Identification					
Permit Number	206-V2	Parish	St. John the Baptist	Date Permit Issued	Mar 14, 2011
Company Name	DuPont Performance Elastomers L.L.C.				
Facility Name	Pontchartrain Site, HCl Recovery Unit			Agency Interest Number	38806
Mailing Address	560 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 2-21-2012		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manger		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting

Title V Permit Number: 206-V2 **Company Name:** DuPont Performance Elastomers L.L.C.

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	No	Attached are copies of the two 2011 semiannual reports. No deviations were reported in 2011.

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

A line by line certification statement is available at our site for review.

AI/AL/CO

11000059 7131
804
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LA

DuPont Protection Technologies
Pontchartrain Site
586 Hwy. 44
LaPlace, LA 70068

RECEIVE

JUL 16 2012

Air/Toxics & Inspection
Coordination Branch
6EN-A

July 10, 2012

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region VI Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Certified Mail No. 7010 1060 0000 6884 7130

RE: NESHAP Y Benzene Storage Tank Quarterly Report
Period: Apr 1, 2012 - Jun 30, 2012
Facility: DuPont DPT in LaPlace, LA

On behalf of E. I. duPont de Nemours and Co., I am submitting the second quarter 2012 report for Flammable Vent Header Flare #1 (source 1500-34) and Flammable Vent Header Flare #2 (source 1500-66). This report is required under 40 CFR 61.275(e)(1). These flares serve as the emission control devices for the Benzene Storage Tank in the Diamines Unit. The tank is covered under Subpart Y of the NESHAP.

As required by the referenced regulation, this report includes a list of the time and duration of emission control system upsets or malfunctions. A copy of this report is also being sent to the Louisiana Department of Environmental Quality. If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
Environmental Coordinator

Enclosure

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
FLARE OUTAGE REPORT FOR BENZENE NESHAP STORAGE TANK

Report Period
Apr 1, 2012 through Jun 30, 2012

I certify that, to the best of my knowledge, the information submitted in the report is accurate.

Signature: _____ Date 7-12-2012
Walter L. Glenn, Plant Manager

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR BENZENE NESHAPS
QUARTERLY REPORT OF EMISSION CONTROL
SYSTEM UPSETS/MALFUNCTIONS
PARA 61.275 (e)(1)(2)(3)

SECOND QUARTER 2012

DATE	TIME START	TIME STOP	TIME LENGTH	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	ESTIMATED BENZENE RELEASE (LB)
There were no upsets or malfunctions of Flammable Vent Header Flare #1 (1500-34) during the second quarter of 2012							
There were no upsets or malfunctions of Flammable Vent Header Flare #2 (1500-65) during the second quarter of 2012							

DuPont Protection Technologies
Pontchartrain Site
586 Hwy. 44
LaPlace, LA 70068

July 10, 2012

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region VI Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Certified Mail No. 7010 1060 0000 6884 7130

RE: NESHAP Y Benzene Storage Tank Quarterly Report
Period: Jan 1, 2012 - Mar 31, 2012
Facility: DuPont DPT in LaPlace, LA

On behalf of E. I. duPont de Nemours and Co., I am submitting the first quarter 2012 report for Flammable Vent Header Flare #1 (source 1500-34) and Flammable Vent Header Flare #2 (source 1500-66). This report is required under 40 CFR 61.275(e)(1). These flares serve as the emission control devices for the Benzene Storage Tank in the Diamines Unit. The tank is covered under Subpart Y of the NESHAP.

As required by the referenced regulation, this report includes a list of the time and duration of emission control system upsets or malfunctions. A copy of this report is also being sent to the Louisiana Department of Environmental Quality. If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
Environmental Coordinator

Enclosures:

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
FLARE OUTAGE REPORT FOR BENZENE NESHAP STORAGE TANK

Report Period
January 1, 2012 through March 31, 2012

I certify that, to the best of my knowledge, the information submitted in the report is accurate.

Signature: Walter L. Glenn Date 7-12-2012

Walter L. Glenn, Plant Manager

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR BENZENE NESHAPS
QUARTERLY REPORT OF EMISSION CONTROL
SYSTEM UPSETS/MALFUNCTIONS
PARA 61.275 (e)(1)(2)(3)

FIRST QUARTER 2012

DATE	TIME START	TIME STOP	TIME LENGTH	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	ESTIMATED BENZENE RELEASE (LB)
There were no upsets or malfunctions of Flammable Vent Header Flare #1 (1500-34) during the first quarter of 2012							
There were no upsets or malfunctions of Flammable Vent Header Flare #2 (1500-66) during the first quarter of 2012							

AI|AI|C

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DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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OCT - 3 2012

Air/Toxics & Inspection
Coordination Branch
6EN-A

October 3, 2012

US EPA Region 6
Compliance Assurance and Enforcement Division
Mail Number: 6-EN-A
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733

CERTIFIED MAIL NO. 7010 1870 0001 2248 3235

Re: Revised Fugitive Periodic Report – Chloroprene Unit

DuPont Pontchartrain Site, is submitting a revised Fugitive Periodic Report for the Chloroprene Unit located in LaPlace Louisiana for the reporting period of October 2011 to March 2012. The original report does not include the valves monitored during February 2012.

We trust this information complies with the requirements of the referenced regulations. If you have any questions you can contact me at (985) 536-5437, or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

cc: Dept. of Environmental Quality
Office of Compliance
P. O. Box 4312
Baton Rouge, La 70821-4312
CERTIFIED MAIL NO. 7010 1870 0001 2248 3242
AI# - 38806

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
SOCMI – GROUP II CATEGORY

PERIODIC REPORT FOR EQUIPMENT LEAKS
[40 CFR §63.182(d)(1)]
Revised October 1, 2011 to March 31, 2012

1. NAME OF FACILITY: DuPont, Pontchartrain Site

PROCESS UNIT: Chloroprene Manufacturing Unit

2. SUMMARY INFORMATION [40 CFR §63.182 (d)(2)]		**2011**			**2012**		
		OCT	NOV	DEC	JAN	FEB	MAR
(i)	No. valves found leaking	0	-	-	0	0	-
	Percent valves leaking	0	-	-	0	0	-
	Total no. monitored	288	-	-	282	2222	-
(ii)	No. leaking valves not repaired	0	-	-	0	0	-
	No. valves not repairable	0	-	-	0	0	-
(iii)	No. pumps found leaking	0	0	0	0	0	0
	Percent leaking pumps	0	0	0	0	0	0
	Total no. monitored	73	73	73	73	73	73
(iv)	No. leaking pumps not repaired	0	0	0	0	0	0
(v)	No. compressors found leaking	0	0	0	0	0	0
(vi)	No. leaking compressors No repaired	0	0	0	0	0	0
(vii)	No. agitators found leaking	0	0	0	0	0	0
(viii)	No. leaking agitators not repaired	0	0	0	0	0	0
(ix)	No. leaking connectors	0	-	-	0	-	-
	Percent connectors leaking	0	-	-	0	-	-
	Total no. monitored	705	-	-	125	-	-

2. SUMMARY INFORMATION [40 CFR §63.182 (d)(2)]		OCT	2011 NOV	DEC	JAN	2012 FEB	MAR
(x)	Reserved						
(xi)	No. leaking connectors not repaired	0	-	-	0	-	-
	No. connectors not repairable	0	-	-	0	-	-
(xii)	Reserved						
(xiii)	Explain delay of repairs, if any, and why process unit shutdown was technically infeasible, if appropriate.						
(xiv)	Results of monitoring to comply with:						
	63.164 (i) – No leaks were detected when monitoring the compressors.						
	63.165 (a) – Pressure relief devices are monitored once a month to insure they operate below the 500 ppm limit.						
	63.172 (f) – Not applicable						
(xv)	Not applicable						
(xvi)	Connectors Monitoring Alternatives – Since the implementation of the fugitive emission program, this unit has used the monitoring alternative described under 63.174(c)(1)(ii).						
(xvii)	Not applicable						

DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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Air/Toxics & Inspection
Coordination Branch
6EN-A

October 3, 2012

US EPA Region 6
Compliance Assurance and Enforcement Division
Mail Number: 6-EN-A
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733

CERTIFIED MAIL NO. 7010 1870 0001 2248 3235

Re: Fugitive Periodic Report – Chloroprene Unit

As required under 40 CFR 63.182.d.1 DuPont Pontchartrain Site, is submitting the Fugitive Periodic Report for the Chloroprene Unit located in LaPlace Louisiana. This report includes the reporting period of April through September 2012. This facility belongs to the SOCMI - Group II category. All monitoring of fugitive emissions has been performed as required by 40 CFR 63.160.

We trust this information complies with the requirements of the referenced regulations. If you have any questions you can contact me at (985) 536-5437, or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

cc: Dept. of Environmental Quality
Office of Compliance
P. O. Box 4312
Baton Rouge, La 70821-4312
CERTIFIED MAIL NO. 7010 1870 0001 2248 3242
AI# - 38806

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
SOCMI – GROUP II CATEGORY

PERIODIC REPORT FOR EQUIPMENT LEAKS
April thru September 2012
[40 CFR §63.182(d)(1)]

1. **NAME OF FACILITY:** DuPont Performance Elastomers L.L.C.

PROCESS UNIT: Chloroprene Manufacturing Unit

2. **SUMMARY INFORMATION**
[40 CFR §63.182 (d)(2)]

		2012					
		APR	MAY	JUN	JUL	AUG	SEP
(i)	No. valves found leaking	0	-	-	0	-	0
	Percent valves leaking	0	-	-	0	-	0
	Total no. monitored	282	-	-	282	-	2164
(ii)	No. leaking valves not repaired	0	-	-	0	-	0
	No. valves not repairable	0	-	-	0	-	0
(iii)	No. pumps found leaking	0	0	0	0	0	0
	Percent leaking pumps	0	0	0	0	0	0
	Total no. monitored	73	73	73	73	73	71 (1)
(iv)	No. leaking pumps not repaired	0	0	0	0	0	0
(v)	No. compressors found leaking	0	0	0	0	0	0
(vi)	No. leaking compressors No repaired	0	0	0	0	0	0
(vii)	No. agitators found leaking	0	0	0	0	0	0
(viii)	No. leaking agitators not repaired	0	0	0	0	0	0
(ix)	No. leaking connectors	-	-	-	-	-	-
	Percent connectors leaking	-	-	-	-	-	-
	Total no. monitored	-	-	-	-	-	-

2. SUMMARY INFORMATION [40 CFR §63.182 (d)(2)]		2012 APR	MAY	JUN	JUL	AUG	SEP
(x)	Reserved						
(xi)	No. leaking connectors not repaired	-	-	-	-	-	-
	No. connectors not repairable	-	-	-	-	-	-
(xii)	Reserved						

(xiii) Explain delay of repairs, if any, and why process unit shutdown was technically infeasible, if appropriate.

(xiv) Results of monitoring to comply with:

63.164 (i) – No leaks were detected when monitoring the compressors.

63.165 (a) – Pressure relief devices are monitored once a month to insure they operate below the 500 ppm limit.

63.172 (f) – Not applicable

(xv) Not applicable

(xvi) Connectors Monitoring Alternatives – Since the implementation of the fugitive emission program, this unit has used the monitoring alternative described under 63.174(c)(1)(ii).

(xvii) Not applicable

Notes:

1. Two pumps were out of service during the September monitoring.

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DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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Air/Toxics & Inspection
Coordination Branch
6EN-A

October 15, 2013

US EPA Region 6
Compliance Assurance and Enforcement Division
Mail Number: 6-EN-A
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733

CERTIFIED MAIL NO. 7011 3500 0001 6350 0486

Re: Fugitive Periodic Report – Chloroprene Unit

As required under 40 CFR 63.182.d.1 DuPont, is submitting the Fugitive Periodic Report for the Chloroprene Unit located in LaPlace Louisiana. This report includes the reporting period of March 2013 through October 2013. This facility belongs to the SOCMI - Group II category. All monitoring of fugitive emissions has been performed as required by 40 CFR 63.160.

We trust this information complies with the requirements of the referenced regulations. If you have any questions you can contact me at (985) 536-5438, or at Anthony.J.Fugarino@dupont.com.

Sincerely,

Anthony Fugarino

Anthony Fugarino
SHE Consultant

Enclosures

cc: Dept. of Environmental Quality
Office of Compliance
P. O. Box 4312
Baton Rouge, La 70821-4312
CERTIFIED MAIL NO. 7011 3500 0001 6350 0493
AI# - 38806

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
SOCMI – GROUP II CATEGORY

PERIODIC REPORT FOR EQUIPMENT LEAKS
April 1 thru September 30, 2013
[40 CFR §63.182(d)(1)]

1. **NAME OF FACILITY:** DuPont

PROCESS UNIT: Chloroprene Manufacturing Unit

2. **SUMMARY INFORMATION**
[40 CFR §63.182 (d)(2)]

		2013					
		APR	MAY	JUN	JUL	AUG	SEP
(i)	No. valves found leaking	-	-	0	0	2	3
	Percent valves leaking	-	-	0	0	0.15	0.90
	Total no. monitored	-	-	274	765	1319	333
(ii)	No. leaking valves not repaired	-	-	-	0	0	0
	No. valves not repairable	-	-	-	0	0	0
(iii)	No. pumps found leaking	2	1	0	1	2	1
	No. pumps leaking §63.182(b)(1)	0	0	0	0	0	0
	Percent leaking pumps	0	0	0	0	0	0
	Total no. monitored	72	72	71[1]	70[2]	70[2]	70[2]
(iv)	No. leaking pumps not repaired	0	0	0	0	0	0
(v)	No. compressors found leaking	0	0	0	0	0	0
(vi)	No. leaking compressors No repaired	0	0	0	0	0	0
(vii)	No. agitators found leaking	0	0	1	0	0	0
(viii)	No. leaking agitators not repaired	0	0	0	0	0	0
(ix)	No. leaking connectors	-	-	-	0	0	0
	Percent connectors leaking	-	-	-	0	0	0
	Total no. monitored	-	-	-	1935	5244	1146

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2013					
		APR	MAY	JUN	JUL	AUG	SEP
(x)	Reserved						
(xi)	No. leaking connectors not repaired	-	-	-	-	-	-
	No. connectors not repairable	-	-	-	-	-	-
(xii)	Reserved						

(xiii) Explain delay of repairs, if any, and why process unit shutdown was technically infeasible, if appropriate. One (1) component had its repair delayed this period and it remains on delay of repair list. Tag# 10625, a pressure relief device (PRD), was found leaking by sensory methods on 7/3/2013. The component was isolated from service and sent to the shop for repair. The component remains isolated from service because the system has a three way valve with a back-up pressure relief device.

(xiv) Results of monitoring to comply with:

63.164 (i) – No leaks were detected when monitoring the compressors this period.

63.165 (a) – Pressure relief devices are monitored once a month to insure they operate below the 500 ppm limit. No leaks were detected when monitoring the pressure relief devices this period. There was one (1) PRD found leaking by sensory methods this period. See details above in section xiii.

63.172 (f) – Not applicable

(xv) Not applicable

(xvi) Connectors Monitoring Alternatives – Since the implementation of the fugitive emission program, this unit has used the monitoring alternative described under 63.174(c)(1)(ii).

(xvii) Not applicable

Notes:

1. One pump was out of service during this monitoring period.
2. Two pumps were out of service during this monitoring period.

AI/AI/CO 110025329491

DuPont

DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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APR - 9 2013

Air/Toxics & Inspection
Coordination Branch
6EN-A

April 9, 2013

US EPA Region 6
Compliance Assurance and Enforcement Division
Mail Number: 6EN-A
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

CERTIFIED MAIL NO. 7011 3500 0001 6350 0097

RE: HON Periodic Report – AI# - 38806

As required under 40 CFR 63.152(c), DuPont is submitting the HON Periodic Report for the Chloroprene Unit, located in LaPlace, Louisiana. This report covers the compliance period of September 19, 2012 to March 18, 2013. Also included with this report is the Startup, Shutdown, and Malfunction Report required under 40 CFR 63.10(d)(5).

If you have any questions or need additional information, you can contact me at (985) 536-5437 or by email at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Environmental Technical Associate

Enclosures

cc: Dept. of Environmental Quality
Office of Compliance
P. O. Box 4312
Baton Rouge, La 70821-4312
CERTIFIED MAIL NO. 7011 3500 0001 6350 0103

DuPont, LaPlace, Louisiana
Chloroprene Unit – AI# 38806
Periodic Report For the Period of
September 19, 2012 to March 18, 2013

DuPont is submitting this Periodic Report for the Chloroprene Unit as required under 40 CFR 63.152(c)(2). This report addresses the information specified in 63.117 and 63.118 for process vents, 63.122 for storage vessels, 63.129 for transfer operations, and 63.146 for process wastewater.

PROCESS VENTS

40 CFR 63.117(a)(7)

Group 2 Vents with a TRE index value greater than 1.0 but less than 4.0.

1. Monitoring Requirements - This facility has one Group 2 process vent with a TRE between 1 and 4. The current Title V Permit, Part 70 Specific Condition No. 2, sets the monitoring requirement for this source.

   "The permittee shall keep the cooling media (brine) temperature of the CD Reactor System's Strippers (A and B lines) condenser, Emission Point 1110-4, below 10°C to maintain a TRE above 1. The maximum temperature shall be below 10°C to ensure Group 2 process vent status. Daily averages of this temperature shall be maintained. Any average temperature outside the range established (10°C) shall be reported in the Periodic Report required under 63.152(c)."

   During this reporting period the daily average temperature of the cooling media on the condenser servicing source 1110-4 was below 10°C while the unit was in operation. No exceedances were experienced during this reporting period.

40 CFR 63.118(f)

This facility has one Group 1 process vent – the Mole Sieve Vent (7000-10A.5), this vent discharges to the Monomer flare. This flare is equipped with a heat-sensing device; presence of the flame is recorded through a process monitoring and control system. Flare is required to have a lit pilot while the Mole Sieve Vent (intermittent flow) is venting.

(1) Daily average values of monitored parameters outside the ranges established in the Notification of Compliance Status.

Not applicable. This vent is controlled with a flare, per 40 CFR 63.118(a)(5), records of the times and duration of all periods during which the pilot flame is absent shall be kept rather than daily averages.

(2) For Group 1 points, duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data.

None.

(3) Times and duration of all periods when the vent stream was diverted from the control device through a bypass line.

Not applicable, this control device does not have a bypass line that can be used to divert the vent stream.

(4) Periods in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line was checked out.

Not applicable, see item 3 above.

(5) Times and duration of all periods in which the pilot flame was absent:

The flame was present while the unit was in operation.

(6) Reports on carbon bed regeneration cycles.

Not applicable, carbon beds are not used to treat Group 1 vents.

<u>40 CFR 63.118(g)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent to become a Group 1 process vent.

<u>40 CFR 63.118(h)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent with a TRE greater than 4 to become a Group 2 process vent with a TRE less than 4.

<u>40 CFR 63.118(i)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent with a flow rate less than 0.005 scm per minute, to become a Group 2 process vent with a flow rate of 0.005 scm per minute or greater, and a TRE value less than or equal to 4.

40 CFR 63.118(j)

There were no process changes made during this reporting period that caused a Group 2 process vent with an organic HAP concentration of less than 50 ppm to become a Group 2 process vent with a HAP concentration of 50 ppm or grater and a TRE value less than or equal to 4.

STORAGE VESSELS

40 CFR 63.122 – The Chloroprene Unit does not have Group 1 storage vessels.

TRANSFER OPERATIONS

40 CFR 63.129 – The Chloroprene Unit does not have Group 1 transfer operations.

PROCESS WASTEWATER

40 CFR 63.146 – Not applicable. This facility is in compliance with the HON Wastewater provisions. All process wastewater sources at this unit are Group 2. No changes in the average flow rate or average VOHAP concentration for the streams occurred during the reporting period.

PERIODIC START UP, SHUTDOWN, AND MALFUNCTION REPORT

Per 40 CFR 63.10(d)(5)(i) this report is not required since during this reporting period the Chloroprene Unit did not experience a start up or shutdown which caused the source to exceed any applicable emissions limits.

DUPONT
CHLOROPRENE UNIT
PERIODIC STARTUP, SHUTDOWN, AND MALFUNCTION
CERTIFICATION REPORT
PER CFR 63.10(d)(5)(i)

As required under 40 CFR 63.6(e)(3), DuPont developed Startup, Shutdown, and Malfunctions plans for the Chloroprene Unit. This unit is covered under the SOCMI HON regulations. During the reporting period of September 19, 2012 to March 18, 2013, all process equipment and pollution control devices were operated in a manner consistent with good air pollution control practices for minimizing emissions to the levels required by all relevant SOCMI HON standards. During this period, all actions taken during startup, shutdown, or malfunction of any process, were consistent with the procedures detailed in the Startup, Shutdown and Malfunctions plans for this unit which are based on the unit's Standard Operating Procedures (SOPs).

I certify that the procedures described in the Startup, Shutdown and Malfunctions plans for the Chloroprene Unit were followed.

Walter L. Glenn

Walter L. Glenn, Plant Manager

5-6-2013

Date

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DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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Coordination Branc
6EN-A

April 7, 2013

US EPA Region 6
Compliance Assurance and Enforcement Division
Mail Number: 6EN-A
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

CERTIFIED MAIL NO. 7011 3500 0001 6350 0813

RE: HON Periodic Report – AI# - 38806

As required under 40 CFR 63.152(c), DuPont is submitting the HON Periodic Report for the Chloroprene Unit, located in LaPlace, Louisiana. This report covers the compliance period of September 19, 2013 to March 18, 2014. Also included with this report is the Startup, Shutdown, and Malfunction Report required under 40 CFR 63.10(d)(5).

If you have any questions or need additional information, you can contact me at (985) 536-5437 or by email at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Senior Environmental Consultant

Enclosures

cc: Dept. of Environmental Quality
Office of Compliance
P. O. Box 4312
Baton Rouge, La 70821-4312
CERTIFIED MAIL NO. 7011 3500 0001 6350 0837

DuPont, LaPlace, Louisiana
Chloroprene Unit – AI# 38806
Periodic Report for the Period of
September 19, 2013 to March 18, 2014

DuPont is submitting this Periodic Report for the Chloroprene Unit as required under 40 CFR 63.152(c)(2). This report addresses the information specified in 63.117 and 63.118 for process vents, 63.122 for storage vessels, 63.129 for transfer operations, and 63.146 for process wastewater.

PROCESS VENTS

40 CFR 63.117(a)(7)

Group 2 Vents with a TRE index value greater than 1.0 but less than 4.0.

1. Monitoring Requirements - This facility has one Group 2 process vent with a TRE between 1 and 4. The current Title V Permit, Part 70 Specific Condition No. 2, sets the monitoring requirement for this source.

   "The permittee shall keep the cooling media (brine) temperature of the CD Reactor System's Strippers (A and B lines) condenser, Emission Point 1110-4, below 10°C to maintain a TRE above 1. The maximum temperature shall be below 10°C to ensure Group 2 process vent status. Daily averages of this temperature shall be maintained. Any average temperature outside the range established (10°C) shall be reported in the Periodic Report required under 63.152(c)."

   During this reporting period the daily average temperature of the cooling media on the condenser servicing source 1110-4 was below 10°C while the unit was in operation. No exceedances were experienced during this reporting period.

40 CFR 63.118(f)

This facility has one Group 1 process vent – the Mole Sieve Vent (7000-10A.5), this vent discharges to the Monomer flare. This flare is equipped with a heat-sensing device; presence of the flame is recorded through a process monitoring and control system. Flare is required to have a lit pilot while the Mole Sieve Vent (intermittent flow) is venting.

(1) Daily average values of monitored parameters outside the ranges established in the Notification of Compliance Status.

Not applicable. This vent is controlled with a flare, per 40 CFR 63.118(a)(5), records of the times and duration of all periods during which the pilot flame is absent shall be kept rather than daily averages.

(2) For Group 1 points, duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data.

None.

(3) Times and duration of all periods when the vent stream was diverted from the control device through a bypass line.

Not applicable, this control device does not have a bypass line that can be used to divert the vent stream.

(4) Periods in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line was checked out.

Not applicable, see item 3 above.

(5) Times and duration of all periods in which the pilot flame was absent:

From 10/28/13 @ 4:25 am until 11/02/13 @ 11:55 pm the flare was down while the site conducted one of the semiannual shutdowns. All units were down, there was no venting to the flare during this period of time.

From 1/24/14 from 5:05 am until 2:45 pm, and on 1/29/14 for approximately one hour, the flare was down due to pilot outage. During this time the mole sieve was not venting and all the sources feeding to the flare were still. Emissions were within the permitted limits.

(6) Reports on carbon bed regeneration cycles.

Not applicable, carbon beds are not used to treat Group 1 vents.

<u>40 CFR 63.118(g)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent to become a Group 1 process vent.

<u>40 CFR 63.118(h)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent with a TRE greater than 4 to become a Group 2 process vent with a TRE less than 4.

40 CFR 63.118(i)

There were no process changes made during this reporting period that caused a Group 2 process vent with a flow rate less than 0.005 scm per minute, to become a Group 2 process vent with a flow rate of 0.005 scm per minute or greater, and a TRE value less than or equal to 4.

40 CFR 63.118(j)

There were no process changes made during this reporting period that caused a Group 2 process vent with an organic HAP concentration of less than 50 ppm to become a Group 2 process vent with a HAP concentration of 50 ppm or grater and a TRE value less than or equal to 4.

STORAGE VESSELS

40 CFR 63.122 – The Chloroprene Unit does not have Group 1 storage vessels.

TRANSFER OPERATIONS

40 CFR 63.129 – The Chloroprene Unit does not have Group 1 transfer operations.

PROCESS WASTEWATER

40 CFR 63.146 – Not applicable. This facility is in compliance with the HON Wastewater provisions. All process wastewater sources at this unit are Group 2. No changes in the average flow rate or average VOHAP concentration for the streams occurred during the reporting period.

PERIODIC START UP, SHUTDOWN, AND MALFUNCTION REPORT

Per 40 CFR 63.10(d)(5)(i) this report is not required since during this reporting period the Chloroprene Unit did not experience a start up or shutdown which caused the source to exceed any applicable emissions limits.

DUPONT
CHLOROPRENE UNIT
PERIODIC STARTUP, SHUTDOWN, AND MALFUNCTION
CERTIFICATION REPORT
PER CFR 63.10(d)(5)(i)

As required under 40 CFR 63.6(e)(3), DuPont developed Startup, Shutdown, and Malfunctions plans for the Chloroprene Unit. This unit is covered under the SOCMI HON regulations. During the reporting period September 19, 2013 to March 18, 2014, all process equipment and pollution control devices were operated in a manner consistent with good air pollution control practices for minimizing emissions to the levels required by all relevant SOCMI HON standards. During this period, all actions taken during startup, shutdown, or malfunction of any process, were consistent with the procedures detailed in the Startup, Shutdown and Malfunctions plans for this unit which are based on the unit's Standard Operating Procedures (SOPs).

I certify that the procedures described in the Startup, Shutdown and Malfunctions plans for the Chloroprene Unit were followed.

Walter L. Glenn, Plant Manager

4-3-2014
Date

AI/AI/CO

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DuPont Chemical Solutions Enterprise
Pontchartrain Plant
586 Highway 44
La Place, LA 70068

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APR 12 2013

Air/Toxics & Inspection
Coordination Branch
6EN-A

April 10, 2013

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region VI Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Certified Mail No. 7011 2970 0002 0993 6727

RE: NESHAP Y Benzene Storage Tank Quarterly Report
Period: Jan 1, 2013 - Mar 31, 2013
Facility: DuPont DPT in LaPlace, LA

On behalf of E. I. duPont de Nemours and Co., I am submitting the first quarter 2013 report for Flammable Vent Header Flare #1 (source 1500-34) and Flammable Vent Header Flare #2 (source 1500-66). This report is required under 40 CFR 61.275(e)(1). These flares serve as the emission control devices for the Benzene Storage Tank in the Diamines Unit. The tank is covered under Subpart Y of the NESHAP.

As required by the referenced regulation, this report includes a list of the time and duration of emission control system upsets or malfunctions. A copy of this report is also being sent to the Louisiana Department of Environmental Quality. If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
Environmental Coordinator

Enclosures:

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
FLARE OUTAGE REPORT FOR BENZENE NESHAP STORAGE TANK

Report Period
January 1, 2013 through March 31, 2013

I certify that, to the best of my knowledge, the information submitted in the report is accurate.

Signature: Walter L. Glenn Date 4-9-2013
Walter L. Glenn, Plant Manager

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR BENZENE NESHAPS
QUARTERLY REPORT OF EMISSION CONTROL
SYSTEM UPSETS/MALFUNCTIONS
PART 61.275 (e)(1)(2)(3)

FIRST QUARTER 2013

DATE	TIME START	TIME STOP	TIME LENGTH	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	ESTIMATED BENZENE RELEASE (LB)
There were no upsets or malfunctions of Flammable Vent Header Flare #1 (1500-34) during the first quarter of 2013							
There were no upsets or malfunctions of Flammable Vent Header Flare #2 (1500-66) during the first quarter of 2013							

A/A/CO

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DuPont Protection Technologies
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068

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JUL 15 2013

Air/Toxics & Inspection
Coordination Branch
6EN-A

July 10, 2013

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region VI Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Certified Mail No. 7011 2970 0002 0980 5122

RE: NESHAP Y Benzene Storage Tank Quarterly Report
Period: Apr 1, 2013 - Jun 30, 2013
Facility: DuPont DPT in LaPlace, LA

On behalf of E. I. duPont de Nemours and Co., I am submitting the second quarter 2013 report for Flammable Vent Header Flare #1 (source 1500-34) and Flammable Vent Header Flare #2 (source 1500-66). This report is required under 40 CFR 61.275(e)(1). These flares serve as the emission control devices for the Benzene Storage Tank in the Diamines Unit. The tank is covered under Subpart Y of the NESHAP.

As required by the referenced regulation, this report includes a list of the time and duration of emission control system upsets or malfunctions. A copy of this report is also being sent to the Louisiana Department of Environmental Quality. If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin, P.E.
Environmental Coordinator

Enclosure

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
FLARE OUTAGE REPORT FOR BENZENE NESHAP STORAGE TANK

Report Period
Apr 1, 2013 through Jun 30, 2013

I certify that, to the best of my knowledge, the information submitted in the report is accurate.

Signature: Walter L. Glenn Date 7-11-2013
Walter L. Glenn, Plant Manager

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR BENZENE NESHAPS
QUARTERLY REPORT OF EMISSION CONTROL
SYSTEM UPSETS/MALFUNCTIONS
PART 61.275 (e)(1)(2)(3)

SECOND QUARTER 2013

DATE	TIME START	TIME STOP	TIME LENGTH	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	ESTIMATED BENZENE RELEASE (LB)
There were no upsets or malfunctions of Flammable Vent Header Flare #1 (1500-34) during the second quarter of 2013							
There were no upsets or malfunctions of Flammable Vent Header Flare #2 (1500-65) during the second quarter of 2013							

AI/AI/CO

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DuPont Protection Technologies
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068

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JUL 15 2013

Air/Toxics & Inspection
Coordination Branch
6EN-A

Certified Mail 7011 2970 0002 0980 5146

Initial Notification of New Regulation Applicability
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

Certified Mail 7011 2970 0002 0980 5139

Initial Notification of New Regulation Applicability
Director, Air, Pesticides and Toxics,
1445 Ross Avenue
Dallas, TX 75202–2733

July 11, 2013

Re: Initial Notification, National Emission Standards for Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater, 40 CFR Part 63 Subpart G

The DuPont Pontchartrain Site, located in St. John Parish, Louisiana, is making the initial notification that it has a new affected source subject to the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater NESHAP Category, 40 CFR Part 63, Subpart G. Information contained in this letter, and as outlined on the attached notification form, is provided in accordance with 40 CFR 63.122(a)(1).

1. Facility: E. I. DuPont de Nemours and Company, Inc., AI# 1101
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068

2. Affected Source: EQT077 – 1500-56B – Hydrogenate Storage Tank No. 2.

If you have questions or need additional information, please call me at 985-536-5241 or email me at toni.l.martin@dupont.com.

Sincerely,

Toni L. Martin, P.E.
Environmental Coordinator

Initial Notification Report

National Emission Standards for Hazardous Air Pollutants from
the Synthetic Organic Chemical Manufacturing Industry
for Process Vents, Storage Vessels, Transfer Operations, and Wastewater

SECTION I: GENERAL INFORMATION

Operating Permit Number: 2090-V6
Responsible Official's Name: Walter L. Glenn

Facility ID Number: Agency Interest #1101
Title: Plant Manager

Name and Address of the Owner or Operator:

E.I.. DuPont de Nemours & Company, Inc.
586 Highway 44
LaPlace, LA 70068

Facility Name: Pontchartrain Works

Facility Street Address (if different than Responsible Official's Street Address listed above)

Same as above.

Facility Local Contact Name: Toni L. Martin **Title**: Environmental Coordinator

Identification of the chemical manufacturing process: Primary SICC = 2869

Anticipated Compliance Date(s) (mm/dd/yy): 06/29/2013

SECTION II: SOURCE DESCRIPTION

Emission Unit ID	Emission Unit Name	Control Device
EQT077	1500-56B Hydrogenate Storage Tank No. 2	EQT0031 (1500-66) Flammable Vent Header No. 2 or EQT031 (1500-34) Flammable Vent Header No. 1 [Non-assisted Flares]

SECTION III: CERTIFICATION

I hereby certify that the information presented herein is correct to the best of my knowledge.

Walter L. Glenn
Signature

7-11-2013
Date

Walter L. Glenn, Plant Manager
Name/title

(985) 536-5129
Telephone Number

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DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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7 31 2013

Air/Toxics & Inspection
Coordination Branch
6EN-A

July 29, 2013

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7011 3500 0001 6350 0325

Re: E.I. DuPont de Nemours – Pontchartrain Site – AI#38806
40 CFR Part 63, Subpart FFFF
Periodic Report – ACR Unit

Enclosed is the Periodic Report, as required under 40 CFR Part 63, Subpart FFFF, the MON MACT regulation, for the DuPont ACR Unit located in LaPlace, Louisiana. This Periodic Report covers the period of January 1 to June 30, 2013.

If you have any questions or comments, you can contact me at 985-536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Senior Environmental Consultant

cc: U.S. EPA Region 6
Air Enforcement Section
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7011 3500 0001 6350 0332

DUPONT

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

ACR UNIT

40 CFR Part 63, Subpart FFFF – PERIODIC REPORT (non-LDAR)

STARTING DATE: JANUARY 1, 2013

ENDING DATE: JUNE 30, 2013

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Walter L. Glenn, Plant Manager
Signature	Walter L. Glenn
Date Signed	7-26-2013

Periodic Report for the ACR Unit
40 CFR Part 63, Subpart FFFF, §63.2520(e)
DuPont
Pontchartrain Site, LaPlace, Louisiana

40 CFR §63.2520(e)(1) Company Name and Address

E. I. DuPont de Nemours Co.
586 Highway 44
LaPlace, La. 70068
Contact – Doris B. Grego
Phone – 985-536-5437
e-mail – doris.b.grego@usa.dupont.com

40 CFR §63.2520(e)(2) Statement by Responsible Official

Included with this submittal.

40 CFR §63.2520(e)(3) Reporting Period

Reporting period beginning on January 1, 2013 and ending on June 30, 2013.

40 CFR §63.2520(e)(4) SSM Malfunctions

There were no SSM in which excess emissions occurred during this reporting period.

40 CFR §63.2520(e)(5) Deviations

No deviations from the permitted limits or permit conditions were experienced during this reporting period.

40 CFR §63.2520(e)(6) CEMS

This facility is not required to have CEMs.

40 CFR §63.2520(e)(7) Operating Scenarios

There were no new operating scenarios since the notification of compliance status was submitted.

40 CFR §63.2520(e)(8) Process Unit Groups

No new process units were added to this facility.

40 CFR §63.2520(e)(9) Other Records

Heat Exchange Systems (63.104(f)(2): This facility does not have heat exchange systems that meet this definition.

Wastewater (63.146(c), (d) and (e): This facility does not have wastewater streams which contain listed HAPs.

Equipment Leaks: If complying with Subpart H, submit the information listed in §63.182(d). If complying with Subpart UU, submit the information listed in §63.1039(b). This facility has selected to comply with Subpart H. The information required under §63.182(d) is included with this report (pages 4 and 5).

Closed Vent Systems and Control Devices: This facility does not have close vent systems.

Floating Roof Tanks: This facility does not have floating roof tanks.

40 CFR §63.2520(e)(10) Notification of Process Change

There were no process changes to this facility during this reporting period that meet the requirements of this subpart.

2013 FIRST SEMI-ANNUAL REPORT

[Information required under 40 CFR §502(i) AND §63.182(d), SUBPART H & I]

1. NAME OF FACILITY: DuPont

PROCESS UNIT: ACR Manufacturing Unit

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2013					
		JAN.	FEB.	MAR.	APR.	MAY	JUN.
(i)	No. valves found leaking	-	0	0	-	-	0
	Percent valves leaking	-	0	0	-	-	0
	Total no. monitored	-	168	111	-	-	279
(ii)	No. leaking valves not repaired	-	0	0	-	-	0
	No. valves not repairable	-	0	0	-	-	0
(iii)	No. pumps found leaking	0	0	0	0	0	0
	Percent leaking pumps	0	0	0	0	0	0
	Total no. monitored	19	19	19	19	19	19
(iv)	No. leaking pumps not repaired	0	0	0	0	0	0
(v)	No. compressors found leaking	NA	NA	NA	NA	NA	NA
(vi)	No. leaking compressors not repaired	NA	NA	NA	NA	NA	NA
(vii)	No. agitators found leaking	NA	NA	NA	NA	NA	NA
(viii)	No. leaking agitators not repaired	NA	NA	NA	NA	NA	NA
(ix)	No. leaking connectors	0	-	-	-	-	-
	Percent connectors leaking	0	-	-	-	-	-
	Total no. monitored	10	-	-	-	-	-

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2013					
		JAN.	FEB.	MAR.	APR.	MAY	JUN.
(x)	Reserved						
(xi)	No. leaking connectors not repaired	0	-	-	-	-	-
	No. connectors not repairable	0	-	-	-	-	-
(xii)	Reserved						

(xiii) Explain delay of repairs, if any, and why process unit shutdown was technically infeasible, if appropriate.

Not Applicable

(xiv) Results of monitoring to comply with:

63.164 (i) – This unit does not have compressors in organic service.

63.165 (a) –This unit does not have pressure relief devices in organic service.

63.172 (f) – Not applicable

(xv) Not applicable

(xvi) Connectors Monitoring Alternatives – Since the implementation of the fugitive emission program, this unit has used the monitoring alternative described under 63.174(c)(1)(ii).

(xvii) Not applicable

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DuPont Protection Technologies
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068

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7-31 2013

Air/Toxics & Inspection
Coordination Branch
6EN-A

Certified Mail No 7011 2970 0002 0980 5153

Routine Air Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div.
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

July 29, 2013

RE: SOCMI HON H Fugitive Emission Monitoring Report for 1st Half of 2013
DuPont Para-phenylenediamine (Diamines) Unit in La Place, LA
LA Air Permit: 2090-V6, Agency Interest No: 1101

Enclosed is the first half of 2013 Semi-Annual Fugitive Emissions Monitoring Report for DuPont's Para-phenylenediamine (Diamines) Unit located in La Place, Louisiana. This unit is subject to the SOCMI HON H fugitive emissions program, the most stringent of the fugitive emissions programs applicable to the facility. This routine report is being submitted as required by 40 CFR 63.182.d.1 and covers January 1, 2013 through June 30, 2013.

A copy of this report has also been sent to the LDEQ. If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
DuPont Environmental Coordinator
586 Hwy 44
LaPlace, LA 70068

Enclosures

cc: LDEQ Office of Environmental Compliance, PO Box 4312, Baton Rouge
Certified Mail No 7011 2970 0002 0980 5160

SYNTHETIC ORGANIC CHEMICAL MANUFACTURING INDUSTRY (SOCMI)
NATIONAL EMISSION STANDARDS FOR HAZARDOUS ORGANIC AIR POLLUTANTS (HON)

SEMIANNUAL REPORT FOR EQUIPMENT LEAKS
(40 CFR 63.182(d), SUBPART H)

1) **NAME OF FACILITY:** DuPont Pontchartrain Site
LOCATION OF FACILITY: LaPlace, LA
PROCESS UNIT: Diamines Production Unit
REPORT PERIOD: 1/1/2013 through 6/30/2013

Section 63.168(d) – VALVES
Phase III monitoring frequency. As of 6/30/2013, this process unit had 0% leaking valves, calculated in compliance with section 63.168(e) definition of percent leaking valves as a rolling average of two consecutive annual monitoring periods. As a result, the 2013 monitoring frequency could stay at once per year (March) Although it is specified in paragraph (d) for process units with less than 0.5% leaking valves to conduct monitoring on an annual basis, we will continue to monitor twice per year (1Q & 3Q) as a best management practice.

(i)	JAN	FEB	MAR	APR	MAY	JUN
Number of leaking Gas/Vapor & LL service valves detected	0	0	0	0	0	0
Percent of leaking Gas/Vapor & LL service valves	0	0	0	0	0	0
Number of Gas/Vapor & LL service valves monitored	0	0	148	0	0	0

(ii) 0 = The number of leaking Gas/Vapor & LL service valves that were not repaired within 15 days
0 = The number of non-repairable Gas/Vapor & LL service valves included in the above quantity

Section 63.163 – PUMPS
Phase III requirements apply.

(iii)	JAN	FEB	MAR	APR	MAY	JUN
The number of leaking LL service pumps detected	0	0	0	0	0	1
The percent of leaking pumps	0	0	0	0	0	20
The number of pumps monitored	5	5	5	5	5	5
(iv)Number of leaking pumps not repaired within 15 days	0	0	0	0	0	0

Section 63.164 – COMPRESSORS (Not applicable)

(v) 0 = The number of leaking compressors detected

(vi) ---- = The number of leaking compressors that were not repaired within 15 days

Section 63.173 – AGITATORS (Not applicable)

(vii) 0 = The number of leaking Gas/Vapor & LL service agitators detected

(viii) ---- = The number of leaking Gas/Vapor & LL service agitators not repaired within 15 days

Section 63.174 – CONNECTORS

Zero percent leaking connectors found in first quarter 1996 and in first quarter 1998. Once every four years is the monitoring frequency under Phase III. Re-monitoring of connectors, completed in the first quarter 2013 was performed, and 0% leaking connectors were found. The next monitoring year will be in 2014. The alternative allowed in section 63.174 (c)(1)(ii) applies to these components.

(ix) 0 = The number of leaking Gas/Vapor & LL service connectors detected
0 = The percent of leaking Gas/Vapor & LL service connectors
250 = The number of Gas/Vapor & LL service connectors monitored including 27 difficult to monitor.

(xi) 0 = The number of leaking Gas/Vapor & LL service connectors not repaired within 15 days
0 = The number of non-repairable Gas/Vapor & LL service connectors included in the above quantity.

(xiii) **EXPLAIN DELAY OF REPAIRS, IF ANY, AND WHY PROCESS UNIT SHUTDOWN WAS TECHNICALLY INFEASIBLE, APPROPRIATE.**

(xiv) **RESULTS OF MONITORING TO SHOW COMPLIANCE WITH SECTIONS 63.164(I), 63.165(A), AND 63.172(F)**

- 63.164 – Not applicable.
- 63.165(a) "Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with an instrument reading of less than 500 parts per million above background…" Zero were found leaking.
- 63.167 – All 306 open-ended lines are provided caps or plugs. Compliance is verified by periodic audits using the cap and plug location list. An audit on June 23 found all required caps in place.
- 63.172(f) – Annual Closed Vent System monitoring was done as scheduled in Nov 2012. No leaks were detected.

WAS ANY ANNUAL MONITORING COMPLETED THIS PERIOD?
The annual connector (250) monitoring was completed in March 2013.

(xv) **HAS THE PLANT INITIATED MONTHLY MONITORING OF VALVES OR QIP FOR VALVES OR PUMPS.**
Not applicable

(xvi) **DOES THE PLANT WISH TO CHANGE CONNECTOR MONITORING ALTERNATIVES**
Not applicable

(xvii) **WERE THERE ANY PROCESS UNIT SHUTDOWNS DURING THIS REPORTING PERIOD? (IF SO LIST DATES.)**
Yes, the Diamines Unit was down in the first half of 2012 during the following dates: January 20, January 31 – February 6, February 15 February 16 – 19, March 1, March 8, March 21 – April 2, April 5, April 15, April 18, April 20, May 19 – June 3, June 5 – 9, June 11 – 21, and June 25.

Toni L. Martin, Environmental Coordinator

July 29, 2013
Date

A1/A1/CO 110000597131

L804

vol 11

DuPont Protection Technologies
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068

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OCT 17 2013

Air/Toxics & Inspection
Coordination Branch
6EN-A

Certified Mail No. 7011 2970 0002 0980 7553

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

October 1, 2013

RE: NESHAP Y Benzene Storage Tank Quarterly Report
Period: July 1, 2013 - Sept 30, 2013
Facility: DuPont DPT in LaPlace, LA

On behalf of E. I. DuPont de Nemours and Co., Inc., I am submitting the third quarter 2013 report for Flammable Vent Header Flare #1 (source 1500-34) and Flammable Vent Header Flare #2 (source 1500-66). This report is required under 40 CFR 61.275(e)(1). These flares serve as the emission control devices for the Benzene Storage Tank in the Diamines Unit. The tank is covered under Subpart Y of the NESHAP.

As required by the referenced regulation, this report includes a list of the time and duration of emission control system upsets or malfunctions. A copy of this report is also being sent to the Louisiana Department of Environmental Quality. If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
Environmental Coordinator

Enclosure

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
FLARE OUTAGE REPORT FOR BENZENE NESHAP STORAGE TANK

Report Period
July 1, 2013 through September 30, 2013

I certify that, to the best of my knowledge, the information submitted in the report is accurate.

Signature: Walter L. Glenn Date 10-2-2013
Walter L. Glenn, Plant Manager

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR BENZENE NESHAPS
QUARTERLY REPORT OF EMISSION CONTROL
SYSTEM UPSETS/MALFUNCTIONS
PART 61.275 (e)(1)(2)(3)

THIRD QUARTER 2013

DATE	TIME START	TIME STOP	TIME LENGTH	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	ESTIMATED BENZENE RELEASE (LB)
There were no upsets or malfunctions of Flammable Vent Header Flare #1 (1500-34) during the third quarter of 2013							
There were no upsets or malfunctions of Flammable Vent Header Flare #2 (1500-65) during the third quarter of 2013							

AI/AI/CO =RS# 110025329401

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DuPont Protection Technologies
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068

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Air/Toxics & Inspection
Coordination Branch
6EN-A

Certified Mail No. 7011 2970 0980 7584

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

October 1, 2013

RE: SOCMI HON Subpart G Periodic Report
Period: Mar 19, 2013 - Sep 18, 2013
Facility: DuPont DPT in LaPlace, LA

Enclosed is the SOCMI Hon Subpart G Periodic Report for DuPont's p-phenylenediamine (Diamines) Unit located in LaPlace, Louisiana. This report is required per 40 CFR 63.152 (c) and covers the compliance period of March 19, 2013 to September 18, 2013. This Periodic Report also includes a signed Startup, Shutdown, and Malfunction Certification as required per 40 CFR 63.10(d)(5)(i) of Subpart A

A copy of this report is also being sent to LDEQ. If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
Environmental Coordinator

Enclosures:

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

E. I. DU PONT DE NEMOURS & COMPANY, INC.
PONTCHARTRAIN SITE
LA PLACE, LOUISIANA
P-PHENYLENEDIAMINES (DIAMINES) UNIT

COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
PERIODIC STARTUP, SHUTDOWN, MALFUNCTION
AND CERTIFICATION REPORT PER PARA 63.10(d)(5)(i)

Semi-Annual Periodic Certification for
March 19, 2013 through September 18, 2013

All actions taken by E. I. DuPont de Nemours & Co., Inc., located at the Pontchartrain Site, during startup, shutdown, or malfunction of any process or air pollution control device equipment were consistent with the procedures detailed in the Startup, Shutdown, and Malfunction Plan. This plan was compiled as required per 40 CFR 63.6(e)(3) for the Diamines Unit which produces p-phenylenediamine and is therefore subject to applicable requirements of SOCMI HON regulations. During the reporting of March 19, 2013 through September 18, 2013, all process equipment and air pollution control device equipment was operated in a manner consistent with good air pollution control practices for minimizing emissions to the levels required by all relevant SOCMI HON standards.

I certify that the procedures described in the Startup, Shutdown, and Malfunction Plan were followed:

Signature: Walter L. Glenn Date: 10-2-2013
Walter L. Glenn, Plant Manager

(If the procedures described in the Startup, Shutdown, and Malfunction Plan were not followed, prepare and attach a Startup, Shutdown, and Malfunction Plan Variance Report.)

E. I. DU PONT DE NEMOURS & COMPANY, INC.
PONTCHARTRAIN SITE
LA PLACE, LOUISIANA
P-PHENYLENEDIAMINES (DIAMINES) UNIT

Semi-Annual Periodic Report for
March 19, 2013 through September 18, 2013

Per 40 CFR 63.152(c)(2), this Periodic Report includes all information specified in 63.117 and 63.118 for process vents, 63.122 for storage vessels, 63.129 for transfer operations, and 63.146 for process wastewater. This report covers the period from March 19, 2013 through September 18, 2013.

PROCESS VENTS

40 CFR 63.118(f):

The following Group 1 process vents are routed to the Flammable Vent Header Flare #1 (1500-34) and the Flammable Vent Header Flare #2 (1500-66): the High Boiler Column (1500-34I), the IPP Column (1500-34J), the Low Boiler Column (1500-34K), and the Refining Column (1500-34L).

(1) Daily average values outside ranges established in Notification of Compliance Status:

Not applicable. The Flammable Vent Header Flare#1, 1500-34 and the Flammable Vent Header Flare #2, 1500-66, are used to control all Group 1 process vent emissions. Per 40 CFR 63.118(a)(5), for flares, records of the time and duration of all periods during which the pilot flame is absent shall be kept rather than daily averages. The Primary Flare used is the Flammable Vent Header Flare #2 (1500-66), and the original Flammable Vent Header Flare #1 (1500-34) is used as a backup.

(2) For Group 1 points, duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data:

There was one instance of insufficient monitoring during this reporting period. See Table 1, Insufficient Monitoring Data for Process Vent Control Devices, attached.

(3) Time and duration of all periods when the vent stream is diverted from the control device through a bypass line:

Exempt: Per 40 CFR 63.114(d), equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to this paragraph. The only existing bypass lines that could divert a vent stream away from the control device are there for safety purposes and are, therefore, exempt from this requirement.

(4) Periods in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line valve was checked out:

Exempt: See (3) above.

(5) Time and duration of all periods in which the pilot flame of the Flammable Vent Header Flare #1, 1500-34, and the Flammable Vent Header Flare #2, 1500-66 were absent:

There were no outages of the Flammable Vent Header Flare #1, 1500-34, and the Flammable Vent Header Flare #2, 1500-66, during this reporting period. See attached Table 2.

(6) Carbon bed regeneration cycles:

Not applicable. Carbon beds are not used as control devices for Group 1 process vents.

40 CFR 63.118(g),(h),(i),and (j):

The Hydrogenate Storage Tank No. 2 (1500-56B) was added to the process on June 29, 2013. The emissions are controlled by the 1500-66 Flammable Vent Header #2 (FVH) or 1500-32 FVH #1. The Initial Notification was submitted on July 10, 2013, and the Notification of Compliance was submitted on October 1, 2013.

There were no process changes made during this report period that caused a Group 2 process vent to become a Group 1 process vent, a Group 2 process vent with a TRE greater than 4.0 to become a Group 2 process vent with a TRE less than 4.0, a Group 2 process vent with a flow rate less than 0.005 scm per minute to become a Group 2 process vent with a flow rate of 0.005 scm per minute or greater with a TRE less than or equal to 4.0, or a Group 2 process vent with an organic HAP concentration less than 50 ppm to become a Group 2 process vent with an organic HAP concentration of 50 ppm or greater with a TRE less than or equal to 4.0. See Table 3, Process Changes Affecting Process Vent Classifications, attached.

STORAGE VESSELS

40 CFR 63.122(g):

Closed vent systems and control devices are used to control emissions from Group 1 storage vessels, the Crude Storage Tank (1500-8A), the Hydrogenate Storage Tank (1500-38A), and Hydrogenate Tank No. 2 (1500-56B). The control devices used to control emissions from these storage vessels are the Crude Storage Tank Scrubber (1500-8), the Hydrogenate Storage Tank Scrubber (1500-38), and Flammable Vent Header #2 (1500-66)/Flammable Venter Header #1

(1) Planned routine maintenance operations that would require the control device to not meet the 95% efficiency emission control requirements:

A description of the planned routine maintenance on the control devices which was performed during the previous six months is presented in Table 4. There were maintenance outages on all four devices totaling 192.25 hours during the reporting period. Anticipated maintenance during the next six months is presented in attached Table 5.

(2) For control devices other than a flare, the occurrence when the monitored parameters were outside the parameter ranges documented in the Notification of Compliance Status:

There were no excursions during this reporting period. See attached Table 6.

(3) For flares, the occurrence when the control device did not meet the general control device requirements per 63.11(b):

There was no occurrence when the flare did not meet the general control device requirements. The flare is used to control emissions from 1500-56B Hydrogenate Storage Tank No. 2, a HON Group 1 storage vessel, as of June 29, 2013. (Note that Flammable Vent Header Flare #1, 1500-34 and the Flammable Vent Header Flare #2, 1500-66 are used to control emissions from a Benzene storage tank covered and reported under the Benzene NESHAP program).

TRANSFER OPERATIONS

40 CFR 63.130(d):

Periodic Report information shall be submitted for transfer racks subject to the requirements of 63.126:

Not applicable. Per 40 CFR 63.126(c), recordkeeping provisions are the only requirement for Group 2 transfer operations. All transfer operations sources are Group 2. No changes in design annual throughput, material loaded, or vapor pressure at transfer racks occurred during this reporting period.

PROCESS WASTEWATER

40 CFR 63.146(c),(d),(e),(f),(g):

Not applicable. All process wastewater sources are Group 2. No changes in average flowrate or average VOHAP concentration for wastewater streams occurred during this reporting period.

LEAK INSPECTIONS

40 CFR 63.148(k):

The closed vent systems subject to these provisions are also subject to 63.172 of subpart H; therefore, leak inspections are conducted according to requirements of 63.172.

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.118(f)(2)

TABLE 1
INSUFFICIENT MONITORING DATA FOR PROCESS VENT CONTROL DEVICES

Report Period
March 19, 2013 to September 18, 2013

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH	EQUIP. NO.	EQUIP. NAME	CAUSE OF MALFUNCTION
11-Jun-13	04:30	11-Jun-13	13:15	8.75 hours	1500-34	Flammable Vent Header #2	A power outage occurred at the plant, which left the data collection system without power. During this time, no temperature readings for the flare were available to the control room board operators, but the low temperature alarm was still operating. At no time did alarm sound; therefore the flare temperature never fell below 400degC.

PER PARA 63.118(f)(5)

TABLE 2
FLAMMABLE VENT HEADER FLARE OUTAGES

Report Period
March 19, 2013 to September 18, 2013

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH (HRS)	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	COMMENTS
There were no flammable vent header flare outages during this reporting period.								

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.118(g), (h), (i), (j)

TABLE 3
PROCESS CHANGES AFFECTING PROCESS VENT CLASSIFICATIONS

Report Period
March 19, 2013 to September 18, 2013

PROCESS VENT NO.	PROCESS VENT NAME	GROUP PRIOR TO PROCESS CHANGE	DESCRIPTION OF PROCESS CHANGE	RESULTS OF RECALCULATION	CONTROL DEVICE FOR COMPLIANCE*
1500-56B	Hydrogenate Tank No. 2	NA	This tank was added to the process on June 29, 2013. The emissions are controlled by the Flammable Vent Header (FVH).	The addition of the emissions to the FVH do not result ain any change to the compliance status of the FVH.	1500-66 Flammable Vent Header #2 & 1500-34 Flammable Vent Header #1

* If process changes were made which changed the classification of a process vent, a statement that the owner or operator will comply with all applicable provisions of 40 CFR 63.113 must also be provided with this report.

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.122(g)(1)

TABLE 4
PAST MAINTENANCE FOR CONTROL DEVICES

Report Period
March 19, 2013 to September 18, 2013

MAINTENANCE PERFORMED DURING THE PAST 6 MONTHS					
EQUIP. NO.	EQUIPMENT NAME	TYPE OF MAINTENANCE PERFORMED	FREQUENCY OF MAINTENANCE	DATE PERFORMED	TIME LENGTH
1500-8	Crude Tank Scrubber	The Crude Tank has been out of service for maintenance and repair. The scrubber was taken off-line on November 1, 2012 at 09:00. This work is still being conducted.	NA	NA	NA
				Total	0.0 hours
1500-34	Flammable Vent Header Flare #1	Both flares were taken out of service for maintenance on 9/16/2013 at 23:30. All pieces of equipment that vent to the flares were either clear of material or stilled and tagged out with no make or take to the tank. The plant is in a shutdown.	As needed	9/16/2013	48.5 hours (for this reporting period)
				Total	48.5 hours
1500-38	Hydrogenate Tank Scrubber	Steaming the scrubber.	As needed	7/24/2012	0.13 hours
1500-38	Hydrogenate Tank Scrubber	The Hydrogenate Scrubber was taken out of service at 15:15 on 5/26/2013 for maintenance work on the scrubber. The Hydrogenate Storage Tank was stilled and tagged. It was placed back in service at 13:45 on 6/1/2013. The palnt was in an outage, and there was no make/take to the Hydrogenate storage tank. The hydrogenate scubber was steamed on 6/25/2013 for 1.25 hours.	As needed	5/26/213	143.75 hours
				Total	143.75 hours
1500-66	Flammable Vent Header Flare #2	Both flares were taken out of service for maintenance on 9/16/2013 at 23:30. All pieces of equipment that vent to the flares were either clear of material or stilled and tagged out with no make or take to the tank. The plant is in a shutdown.	As needed	9/16/2013	48.5 hours (for this reporting period)
				Total	48.5 hours

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.122(g)(1)

TABLE 5
PLANNED MAINTENANCE FOR CONTROL DEVICES

Report Period
March 19, 2013 to September 18, 2013

MAINTENANCE ANTICIPATED TO BE PERFORMED WITHIN THE NEXT 6 MONTHS				
EQUIP. NO.	EQUIPMENT NAME	TYPE OF MAINTENANCE	FREQUENCY OF MAINTENANCE	TIME LENGTH ESTIMATE
1500-8	Crude Tank Scrubber	Routine Yearly Maintenance	None scheduled for the next 6 months	NA
1500-34	Flammable Vent Header Flare No. 1	Routine Yearly Maintenance	None scheduled for the next 6 months	NA
1500-38	Hydrogenate Tank Scrubber	Routine Yearly Maintenance	None scheduled for the next 6 months	NA
1500-66	Flammable Vent Header Flare No. 2	Routine Yearly Maintenance	None scheduled for the next 6 months	NA

*The Diamines Title V Permit (2090-V2) authorizes construction and operation of the Flammable Vent Header Flare No. 2 (1500-66) as the primary flare. The existing Flammable Vent Header Flare (1500-34) shall be used only when the primary flare is down.

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.122(g)(2)

TABLE 6
MONITORED PARAMETER EXCURSIONS FOR STORAGE VESSELS

Report Period
March 19, 2013 to September 18, 2013

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH hrs:min	EQUIP. NO.	EQUIP. NAME	CAUSE OF MALFUNCTION
There were no excursions during this reporting period.							

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DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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Coordination Branch
6EN-A

November 14, 2013

US EPA Region 6
Compliance Assurance and Enforcement Division
Mail Number: 6EN-A
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

CERTIFIED MAIL NO. 7011 3500 0001 6350 0608

RE: HON Periodic Report – AI# - 38806

As required under 40 CFR 63.152(c), DuPont is submitting the HON Periodic Report for the Chloroprene Unit, located in LaPlace, Louisiana. This report covers the compliance period of March 19, 2013 to September 18, 2013. Also included with this report is the Startup, Shutdown, and Malfunction Report required under 40 CFR 63.10(d)(5).

If you have any questions or need additional information, you can contact me at (985) 536-5437 or by email at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Senior Environmental Consultant

Enclosures

cc: Dept. of Environmental Quality
Office of Compliance
P. O. Box 4312
Baton Rouge, La 70821-4312
CERTIFIED MAIL NO. 7011 3500 0001 6350 0615

DuPont, LaPlace, Louisiana
Chloroprene Unit – AI# 38806
Periodic Report for the Period of
March 19 to September 18, 2013

DuPont is submitting this Periodic Report for the Chloroprene Unit as required under 40 CFR 63.152(c)(2). This report addresses the information specified in 63.117 and 63.118 for process vents, 63.122 for storage vessels, 63.129 for transfer operations, and 63.146 for process wastewater.

PROCESS VENTS

40 CFR 63.117(a)(7)

Group 2 Vents with a TRE index value greater than 1.0 but less than 4.0.

1. Monitoring Requirements - This facility has one Group 2 process vent with a TRE between 1 and 4. The current Title V Permit, Part 70 Specific Condition No. 2, sets the monitoring requirement for this source.

   "The permittee shall keep the cooling media (brine) temperature of the CD Reactor System's Strippers (A and B lines) condenser, Emission Point 1110-4, below 10°C to maintain a TRE above 1. The maximum temperature shall be below 10°C to ensure Group 2 process vent status. Daily averages of this temperature shall be maintained. Any average temperature outside the range established (10°C) shall be reported in the Periodic Report required under 63.152(c)."

   During this reporting period the daily average temperature of the cooling media on the condenser servicing source 1110-4 was below 10°C while the unit was in operation. No exceedances were experienced during this reporting period.

40 CFR 63.118(f)

This facility has one Group 1 process vent – the Mole Sieve Vent (7000-10A.5), this vent discharges to the Monomer flare. This flare is equipped with a heat-sensing device; presence of the flame is recorded through a process monitoring and control system. Flare is required to have a lit pilot while the Mole Sieve Vent (intermittent flow) is venting.

(1) Daily average values of monitored parameters outside the ranges established in the Notification of Compliance Status.

Not applicable. This vent is controlled with a flare, per 40 CFR 63.118(a)(5), records of the times and duration of all periods during which the pilot flame is absent shall be kept rather than daily averages.

(2) For Group 1 points, duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data.

None.

(3) Times and duration of all periods when the vent stream was diverted from the control device through a bypass line.

Not applicable, this control device does not have a bypass line that can be used to divert the vent stream.

(4) Periods in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line was checked out.

Not applicable, see item 3 above.

(5) Times and duration of all periods in which the pilot flame was absent:

During the following period the flare was down while the site conducted one of the semiannual shutdowns. All units were down, there was no venting to the flare during this period of time.

5/13/13 @ 11:31 pm until 5/24/13 @ 9:02 am

(6) Reports on carbon bed regeneration cycles.

Not applicable, carbon beds are not used to treat Group 1 vents.

<u>40 CFR 63.118(g)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent to become a Group 1 process vent.

<u>40 CFR 63.118(h)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent with a TRE greater than 4 to become a Group 2 process vent with a TRE less than 4.

<u>40 CFR 63.118(i)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent with a flow rate less than 0.005 scm per minute, to become a Group 2 process vent with a flow rate of 0.005 scm per minute or greater, and a TRE value less than or equal to 4.

40 CFR 63.118(j)

There were no process changes made during this reporting period that caused a Group 2 process vent with an organic HAP concentration of less than 50 ppm to become a Group 2 process vent with a HAP concentration of 50 ppm or grater and a TRE value less than or equal to 4.

STORAGE VESSELS

40 CFR 63.122 – The Chloroprene Unit does not have Group 1 storage vessels.

TRANSFER OPERATIONS

40 CFR 63.129 – The Chloroprene Unit does not have Group 1 transfer operations.

PROCESS WASTEWATER

40 CFR 63.146 – Not applicable. This facility is in compliance with the HON Wastewater provisions. All process wastewater sources at this unit are Group 2. No changes in the average flow rate or average VOHAP concentration for the streams occurred during the reporting period.

PERIODIC START UP, SHUTDOWN, AND MALFUNCTION REPORT

Per 40 CFR 63.10(d)(5)(i) this report is not required since during this reporting period the Chloroprene Unit did not experience a start up or shutdown which caused the source to exceed any applicable emissions limits.

DUPONT
CHLOROPRENE UNIT
PERIODIC STARTUP, SHUTDOWN, AND MALFUNCTION
CERTIFICATION REPORT
PER CFR 63.10(d)(5)(i)

As required under 40 CFR 63.6(e)(3), DuPont developed Startup, Shutdown, and Malfunctions plans for the Chloroprene Unit. This unit is covered under the SOCMI HON regulations. During the reporting period of March 19 to September 18, 2013, all process equipment and pollution control devices were operated in a manner consistent with good air pollution control practices for minimizing emissions to the levels required by all relevant SOCMI HON standards. During this period, all actions taken during startup, shutdown, or malfunction of any process, were consistent with the procedures detailed in the Startup, Shutdown and Malfunctions plans for this unit which are based on the unit's Standard Operating Procedures (SOPs).

I certify that the procedures described in the Startup, Shutdown and Malfunctions plans for the Chloroprene Unit were followed.

Walter L. Glenn

Walter L. Glenn, Plant Manager

11-12-2013

Date

AI/AI/CO

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DUPONT

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DuPont
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

November 18, 2013

Dept. of Environmental Quality
Office of Environmental Services, Air Permits Division
P. O. Box 4313
Baton Rouge, La 70821-4313

CERTIFIED MAIL NO. 7011 3500 0001 6350 0509

Re: DuPont Pontchartrain Site Fugitive Emissions Program Consolidation Source Notice and Agreement (AI# 1101 and AI# 38806)

The DuPont Pontchartrain Site (DuPont) is requesting consolidation of all applicable site fugitive emission programs in accordance with the Louisiana Fugitive Emission Program Consolidation Guidelines and is hereby submitting the attached Source Notice and Agreement. DuPont will implement the consolidated program beginning January, 1, 2014.

While several units are only subject to less stringent fugitive emission rules, the entire site will comply with the HON (40 CFR 63 Subpart H) as the most stringent and guiding fugitive rule in each unit at the site. According to 40 CFR 63.162(g)(2) and 63.9(i) it is acceptable to adjust time periods upon mutual agreement between owner and Administrator. In addition to being regulatory acceptable, adjusting time periods is in keeping with the spirit of the consolidation agreement recordkeeping and report streamlining intention. DuPont is also requesting that the reporting, recordkeeping, and monitoring time period (schedule) be readjusted for the entire site to coincide with the current Diamines, ACR, and HCL Recovery Unit's schedule which runs as a calendar year from January through December therefore making the entire site applicable to one time period. Each unit at the site currently has a leak rate that allows for annual valve and biennial connector monitoring. From the effective date, leak rates will be consolidated and calculated for the entire site per HON guidelines. The DuPont Pontchartrain Site will continue the annual valve and biennial connector monitoring frequency for the plant site until percentage leak rates dictate altering the monitoring frequency.

The following paragraphs provide additional details relating to the fugitive programs being consolidated and how the fugitive program will be structured after the effective date.

The DuPont Pontchartrain Site currently has five units subject to various fugitive emissions regulations which have multiple overlapping applicable reporting and recordkeeping requirements. The recordkeeping requirements of these various regulations result in the same data being saved and summarized multiple times in the LDAR database. The current reporting requirements result in the submittal

of ten different reports with deadlines for these reports at different times throughout the year. These different reports often result in submitting data already reported in previous reports. In other words, multiple reports are due for different periods with some of these reports requiring and containing the same data or at least some of the same data. The *Fugitive Emissions Semi-annual Report Summary Table* below summarizes the program report and reporting time period information for each unit.

The following is a list of the units at the site with the most stringent applicable regulation in parenthesis: the Diamines Unit (HON), ACR Unit (MON), Chloroprene Unit (HON), the Neoprene Unit (Polymer & Resins I), and the HCL Recovery Unit (RCRA BB). The Diamines Unit which has always been owned by E. I. du Pont de Nemours Co. has already been consolidated by agreement dated October 15, 1996. The ACR, Chloroprene, HCl Recovery, and Neoprene Units were operated by DuPont Performance Elastomers, a separate entity, before 2013 and are not currently consolidated per Louisiana Fugitive Agreement. The entire facility (DuPont Pontchartrain Site) is now owned by E. I. du Pont de Nemours Co.

Fugitive Emissions Semi-annual Report Summary Table

Unit	Program Report	Reporting Time Period before January 1, 2014	Reporting Time Period beginning on January 1, 2014
Diamines	HON - Consolidated	January through June and July through December	January through June and July through December
Chloroprene	HON	April through September and October through March	January through June and July through December
Neoprene	Polymers and Resins I	August through January and February through July	January through June and July through December
ACR	MON	January through June and July through December	January through June and July through December
HCL Recovery	Chapter 21	January through June and July through December	January through June and July through December

Note: Chapter 21 report contains data from Chloroprene, Neoprene, and ACR Units also.

Consolidating all the units at the DuPont Pontchartrain Site and making HON the Guiding Regulation (most stringent rule) throughout the site, will reduce the recordkeeping and reporting requirements without reducing quality of data that was submitted in the multiple reports. All of the monitoring and leak data would still be reported, it will just be reported in two semi-annual reports instead of the current ten reports that result in multiple instances of data duplication. The site will also be complying with an overall more stringent fugitive emissions program

than by complying with various less stringent programs, therefore over time reducing fugitive emissions at the site. The DuPont Pontchartrain Site will continue to submit fugitive reports for the non-HON regulations until all data for the 2013 calendar year has been reported. After all 2013 data has been reported per non-HON fugitive requirements, the DuPont Pontchartrain Site will discontinue these non-HON fugitive reports and will only submit HON semi-annual reports twice a year for the entire site.

Each unit at the site currently has a leak rate that allows for annual valve and biennial connector monitoring. The DuPont Pontchartrain Site will continue this monitoring frequency (skip period frequency) for the plant site until percentage leak rates dictate altering the monitoring frequency. Leak rates will be calculated for the entire site per HON for periods that relate to calendar year of January through December beginning on the effective date.

In summary, on January 1, 2014, the effective date of the consolidated agreement, the DuPont Pontchartrain Site will streamline the recordkeeping, reporting, and monitoring requirements and readjust the recordkeeping, reporting, and monitoring requirements' annual time period to January through December to coincide with the current Diamines, ACR, and HCL Recovery Units' annual time period while keeping the current skip period monitoring frequency intact.

At the next opportunity for renewal or modification of each of the effective permits, DuPont will include a copy of the Fugitive Emissions Program Consolidation Source Notice and Agreement in each of the effective Title V operating permit applications. Current effective Permit Numbers are 3000-V3, 206-V1, 2249-V6, and 2090-V5.

If you have any questions or need additional information you can contact me at (985) 536-5438, or at Anthony.J.Fugarino@dupont.com.

Sincerely,

Anthony Fugarino

Anthony Fugarino
SHE Consultant

Enclosures

cc: US EPA Region 6
Compliance Assurance and Enforcement Division
Mail Number: 6-EN-A
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7011 3500 0001 6350 0516

Louisiana Fugitive Emission Program Consolidation
Source Notice and Agreement
DuPont Pontchartrain Site, St. John the Baptist Parish
(Agency Interest Numbers 1101 and 38806)

By this notice and agreement, E. I. du Pont de Nemours Co. (DuPont Pontchartrain Site) notifies the Louisiana DEQ (LDEQ) and the United States Environmental Protection Agency (EPA) of the consolidation of fugitive emission programs as indicated below, effective January 1, 2014. Semiannual reports will be submitted on August 15 and February 15, to cover the periods January 1 through June 30 and July 1through December 31, respectively. DuPont Pontchartrain Site agrees to implement the consolidated program in accordance with the Louisiana Fugitive Emission Program Consolidation Guidelines attached, and accepts federal and state enforceability of the consolidated program by EPA and LDEQ. DuPont Pontchartrain Site further acknowledges that compliance with the consolidated program in accordance with the Guidelines will serve to comply with each of the fugitive emission programs being consolidated. In addition, DuPont Pontchartrain Site acknowledges that noncompliance with the consolidated program in accordance with the Guidelines may subject DuPont Pontchartrain Site to enforcement action for one or more of the fugitive emissions programs being consolidated. Unless successfully challenged or otherwise terminated, this agreement remains in effect until revised or replaced upon request by DuPont Pontchartrain Site, LDEQ, or EPA, or until the initial Part 70 permit is issued for DuPont Pontchartrain Site, whichever is earliest. If, at any time, the agreement is not in effect with the State, then it shall not be in effect with EPA.

While several units at the DuPont Pontchartrain Site are only subject to less stringent fugitive emission rules, the entire site will comply with the HON (40 CFR 63 Subpart H) as the most stringent and guiding fugitive rule in each unit at the site per table below. On the effective date the reporting, recordkeeping, and monitoring time period (schedule) will be readjusted for the entire site to coincide with the current Diamines, ACR, and HCL Recovery Unit's schedule which runs as a calendar year from January through December therefore making the entire site applicable to just one time period. Also from the effective date, leak rates will be consolidated and calculated for the entire site per HON guidelines. The DuPont Pontchartrain Site will continue the annual valve and biennial connector monitoring frequency for the plant site until percentage leak rates dictate altering the monitoring frequency.

Unit or Plant Site	Programs being Consolidated	Stream Applicability	Overall Most Stringent Program
DuPont Pontchartrain Site	63 Sub H – HON 63 Sub FFFF 63 Sub U - P & R I LA Non-HON NSPS RCRA Sub BB LAC 33:III.2121	5% VOHAP 5% VOHAP 5% VOHAP 5% VOTAP 10% VOC 10% VOC 10% VOC	63 Subpart H - HON MACT

Signed

Walter Glenn

Walter Glenn, Plant Manager

This 18 day of November, 2013

Louisiana Fugitive Emission Program Consolidation Guidelines

Workpractice Terms and Conditions. These terms and conditions are to be used in conjunction with the Stringency Table. Of the applicable equipment leak programs being consolidated, the program highest in the table hierarchy is to be considered the overall most stringent program under the Guidelines. The Guidelines may be used only in accordance with a Source Notice and Agreement or a Title V permit.

Applicability and Exemptions

- The consolidated program will apply to the combined universe of components subject to any of the programs being consolidated.
- The consolidation of fugitive programs must be conducted at a minimum of the process unit level, and may also be on a facility-wide basis.
- Consolidation of RCRA programs must first be approved by LDEQ's Hazardous Waste Section.
- Component types which do not require periodic monitoring under the overall most stringent program, must be monitored as required by the most stringent requirements of any other program being consolidated and will not be exempted.
- The consolidated program will include any exemptions based on size of component available in any of the programs being consolidated.
- The consolidated program cannot be used to replace requirements for area monitoring under the vinyl chloride NESHAP.
- For any compressor subject to a federal rule requiring a seal system including barrier fluid, sensor, and alarm, periodic monitoring of compressors may not be used in lieu of the seal system requirements, regardless of the overall most stringent program.

Leak Definitions

- Leak definitions are based on the overall most stringent program as determined from the Stringency Table.
- Phase-in periods allowed under federal regulations are not eliminated as long as there is no backsliding of existing monitoring programs.

Monitoring Frequency

- Monitoring frequency will be based on the overall most stringent program as determined from the Stringency Table.
- Annual monitoring shall be defined as once every 4 quarters, regardless of the overall most stringent program. Some allowance may be made in the first year of the consolidation in order to allow for transition from existing monitoring schedules.

Calibration

- Use of dilution device for calibration, as defined in Method 21, is acceptable.

Identification of Components

- All leaking components must be tagged.
- If the Benzene NESHAP and a more stringent program are applicable, the overall most stringent program prevails and physical tagging of components is therefore not required. Identification, either by list or location (area or group) of affected components is acceptable.

Leak Performance

- The determination of leak performance is based on the overall most stringent program as determined from the Stringency Table.

Repair

- Repair period requirements are always first attempt within 5 days of detecting the leak and final repair within 15 days of detecting the leak, regardless of the overall most stringent program.

Post Repair

- Post repair inspection consists of remonitoring once within 3 months after repair of leaks, regardless of the overall most stringent program.

Record keeping and Reporting

- Record keeping and reporting information requirements will be based on the overall most stringent program as determined from the Stringency Table.
- Reporting frequency will be semi-annual regardless of the overall most stringent program.
- Reports will include records for any monitoring performed within the semi-annual reporting period.

A1/A1,CO

1100 253 29491

LA 804

DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

RECEIVE

JAN 16 2014

Air/Toxics & Inspection
Coordination Branch
6EN-A

January 14, 2014

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, La. 70821-4312

CERTIFIED MAIL NO. 7011 3500 0001 6350 0707

Re: DuPont – Pontchartrain Site – AI#38806
Polymers and Resins Group I MACT (40 CFR Part 63, Subpart U)
Periodic Report (non-LDAR) for May 16, 2013 through November 15, 2013

Enclosed is the non-equipment leak Periodic Report under 40 CFR Part 63, Subpart U, of the Polymers & Resins Group I MACT regulation, for the DuPont Neoprene Plant located in LaPlace, Louisiana. As required by 40 CFR §63.506(e)(6)(i), this non-equipment leak Periodic Report covers the 6-month period beginning May 16, 2013 and ending on November 15, 2013.

A detailed analysis of the Periodic Report elements in 40 CFR §63.506(e)(6) is attached. Those applicable and not applicable (N/A) to the Neoprene Unit are noted.

If you have any questions or need additional information, you can contact me at (985) 536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P. E.
Senior Environmental Consultant

Enclosures

cc: U.S. EPA Region 6
Air Enforcement Section
1445 Ross Avenue, Suite 700
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7011 3500 0001 6350 0714

DUPONT

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

TITLE V OPERATING PERMIT NO. 2249-V6

P&R I MACT – PERIODIC REPORT (non-LDAR)

STARTING DATE: MAY 16, 2013

ENDING DATE: NOVEMBER 15, 2013

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Walter L. Glenn
Responsible Official's Title	Plant Manager
Signature	Walter L. Glenn
Date Signed	1-13-14

Analysis of Periodic Reporting Requirement of Polymers & Resins Group I MACT, 40 CFR Part 63, Subpart U, §63.506(e)(6)
Periodic Report (non-LDAR) for DuPont
Pontchartrain Site, LaPlace, Louisiana
Reporting period beginning on May 16, 2013 and ending on November 15, 2013

40 CFR §63.506(e)(6)(i). Frequency of reporting and time period covered.

This paragraph refers to paragraphs (e)(6)(xi) and (e)(6)(xii) of §63.506 as potentially applicable exceptions to the requirement to submit semiannual Periodic Reports. Paragraph (e)(6)(xi) addresses emission points included in an emissions average. The affected Elastomer Product Process Unit (EPPU) is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in paragraph (e)(6)(xi) is not applicable (N/A).

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with these limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had no control or recovery devices for a particular emission point or process section that had excursions, as defined in §63.505(g).

The second requirement concerning quarterly reporting under paragraph (e)(6)(xii) relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(*2*). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

In the absence of a requirement to submit quarterly reports, Periodic Reports are required semiannually by paragraph (e)(6)(i). The first report was required to be submitted no later than 240 days after the date the Notification of Compliance Status was due. The Notification of Compliance Status submittal deadline was November 16, 2001. The date 240 days after the November 16, 2001 date is July 14, 2002. In addition, the first Periodic Report was required to address the six-month period beginning on the date that the Notification of Compliance Status was due. Periodic Report #1 (non-LDAR) thus covered the reporting period beginning on November 16, 2001, and ending on May 15, 2002. This Periodic Report covers the six-month reporting period, beginning on May 16, 2013 and ending on November 15, 2013.

40 CFR §63.506(e)(6)(ii). Content of Periodic Reports under certain conditions.

If during the reporting period, the affected source experienced none of the compliance exceptions or activities identified in §§63.506(e)(6)(iii) through (e)(6)(ix), then the Periodic Report is to take the short form. In this case, the Periodic Report should contain a statement that there were no compliance exceptions as specified in paragraphs (e)(6)(iii) through (e)(6)(ix) of §63.506 for the six-month period covered by the report, and that none of the activities specified in those same paragraphs occurred during the same six-month period.

40 CFR §63.506(e)(6)(iii). Content of Periodic Reports under all other conditions.

This paragraph references specific information to be provided in the Periodic Report if the conditions in the preceding paragraph (e)(6)(ii) were not met during the reporting period. The paragraph applies to affected sources subject to §63.484 through 63.501 for any emission point. This equates to affected sources subject to Subpart U and having specific applicable requirements for any combination of storage vessels, continuous front-end process vents, batch front-end process vents, back-end process vents, or process wastewater. The affected EPPU identified its specific applicable requirements in its Notification of Compliance Status submittal.

The affected EPPU notes that §63.501(a) identifies the applicable requirements for maintenance wastewater as §63.105(a). The applicable requirements for maintenance wastewater do not include any requirement to report information in the Periodic Reports required by §63.506(e)(6).

40 CFR §63.506(e)(6)(iii)(A). Cross-references to specific reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Cross-reference (40 CFR)	Required Information and Applicability
§63.122(a)(4) for storage vessels	Relates to Group 1 storage vessels (N/A)
§§63.117(a)(3), 63.118(f), and 63.485(s)(5) for continuous front-end process vents	§63.117(a)(3) relates to TRE determinations or performance tests conducted after the Notification of Compliance Status (NoCS) has been submitted. - The affected EPPU had no process changes during this reporting period that required a recalculation of the TRE index value. - The affected EPPU conducted no performance tests during this reporting period. §63.118(f)(1) relates to daily average values of monitored parameters for all operating days when daily average values recorded were outside the levels established in the NoCS or the Title V operating permit - The affected EPPU had no such days during this reporting period. §63.118(f)(2) relates to Group 1 emission points with excursions caused by insufficient monitoring data (N/A). §63.118(f)(3) relates to the times and durations of periods recorded when the vent stream is diverted from its control device through a bypass line (N/A). §63.118(f)(4) relates to periods recorded when the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line valve was checked out (N/A). §63.118(f)(5) relates to periods when all pilot flames of a flare were absent (N/A). §63.118(f)(6) relates to carbon bed regeneration cycles with recorded parameters outside the levels established in the NoCS or the Title V operating permit (N/A). §63.485(s)(5) relates to Group 1 continuous front-end process vents controlled using an internal combustion engine (N/A).
§63.492 for batch front-end process vents and aggregate batch vent streams	§63.492(a) relates to information required in the NoCS (N/A). §63.492(b) relates to process changes causing a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. §63.492(c) relates to process changes that – - cause a Group 2 batch front-end process vent with annual emissions less than 11,800 kg/year to have annual emissions greater than or equal to 11,800 kg/year but not changing the Group 2 status of the batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. - or require redetermination of the batch mass input limitation (N/A). §63.492(d) specifies process changes for which reporting is not required (N/A).

Cross-reference (40 CFR)	Required Information and Applicability
§63.492 for batch front-end process vents and aggregate batch vent streams (continued)	§63.492(e) relates to information required in the Precompliance Report for alternative control devices or alternative monitoring parameters (N/A). §63.492(f) relates to affected sources required to monitor bypass lines around control devices per §63.489(d) (N/A).
§63.499 for back-end process operations	The affected EPPU has no back-end process requirements per §63.494(a)(4) (N/A).
§63.104(f)(2) for heat exchange systems	Addresses reporting requirements if the delay-of-repair provisions are invoked (N/A). Note: The affected EPPU has heat exchange systems meeting the condition specified in §63.104(a)(1)—that the heat exchange systems are operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side. Accordingly, the requirements of §63.104(a)(1) do not apply to the affected EPPU.
§63.146(c) – (g) for process wastewater	§63.146(c) relates to waste management units that receive, manage, or treat Group 1 process wastewater stream(s) or residual(s) removed from Group 1 process wastewater stream(s) (N/A). §63.146(d) relates to treatment processes for Group 1 process wastewater streams and/or residuals removed from Group 1 wastewater streams (N/A). §63.146(e) relates to control devices for organic HAP emissions from Group 1 process wastewater streams (N/A). §63.146(f) relates to owners or operators who have obtained approval to use an alternative treatment process or control device or to monitor a set of alternative parameters and therefore have alternate reporting requirements (N/A). §63.146(g) relates to extensions of time to empty and remove a Group 1 process wastewater tank equipped with a floating roof from service for inspection or repairs to the floating roof per §63.133(e)(2) or for control equipment repair per §63.133(h) (N/A)

40 CFR §63.506(e)(6)(iii)(B). Reporting requirements for excursions.

This paragraph requires the owner or operator of the affected EPPU to report the daily average values or batch cycle daily average values of monitored parameters for each excursion.

Excursions are defined by paragraphs (g) and (h) of §63.505. As noted above, §63.505(h) does not apply to the affected EPPU but §63.505(g) does. In addition, for excursions caused by lack of monitoring data, the owner or operator is to specify the start time and duration of each period when monitoring data were not collected.

No excursions were experienced during this reporting period.

40 CFR §63.506(e)(6)(iii)(C). [Reserved.]

40 CFR §63.506(e)(6)(iii)(D). Additional reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Citation (40 CFR §63.506)	Required Information and Applicability
(e)(6)(iii)(D)(*1*)	Supplements to the Emissions Averaging Plan, if any, per paragraph (e)(4)(iii) (N/A).
(e)(6)(iii)(D)(*2*)	Notification if a process change is made that changes the group status of any emission point from Group 2 to Group 1. - The affected EPPU had no such process changes during the reporting period.
(e)(6)(iii)(D)(*3*)	Notification of addition of one or more emission points or EPPUs to the affected source, with description and notification of the group status of the additional emission point or of all emission points in the EPPU. - The affected EPPU added no emission points or EPPUs during the reporting period.
(e)(6)(iii)(D)(*4*)	For EPPUs producing styrene-butadiene rubber by an emulsion process, notification of changes in standard operating procedures affecting carbon disulfide concentration in crumb dryer exhaust (N/A).
(e)(6)(iii)(D)(*5*)	Changes in the identity of the treatment facility or transferee receiving process wastewater streams for treatment pursuant to §63.132(g) (N/A).

40 CFR §63.506(e)(6)(iii)(E). Start-up, shutdown, and malfunction reports.

[Please note that the U.S. Environmental Protection Agency amended 40 CFR §63.10(d)(5)(i) and the final rule was published in the Federal Register on May 30, 2003 (68 FR 32586). This notice requires the submittal of a Shutdown and Malfunction Report with the Periodic Reports. The Neoprene Unit has procedures in place that meet the requirements of this regulation. Since this facility does not have a Group 1 source, it is our understanding, based on 40 CFR §63.506(b)(i), that a Shutdown and Malfunction Report is not required.]

This paragraph refers to the information required by paragraph (b)(1)(ii) of §63.506. In turn, §63.506(b)(1)(ii) requires semiannual start-up, shutdown and malfunction reports to be submitted on the same schedule as the non-LDAR Periodic Reports and to include the information specified in §63.10(d)(5)(i).

The affected EPPU notes, however, that paragraph (b)(1) of 40 CFR §63.506 does not require the owner or operator of an affected source to include Group 2 emission points in the written start-up, shutdown and malfunction plan unless the Group 2 emission points are included in an emissions average. Further, this paragraph limits the start-up, shutdown and malfunction plan requirement to control devices for equipment leaks and makes it optional for other equipment. The affected EPPU has no Group 1 emission points and no control devices for equipment leaks. Accordingly, the affected EPPU asserts that it is not required to develop and implement a written start-up, shutdown and malfunction plan pursuant to §63.506(b)(1).

Furthermore, §63.506(b)(1) states in its final sentence that reports related to the plan shall be submitted as specified in paragraph (b)(1)(ii) of §63.506. If the affected EPPU is not required by §63.506(b)(1) to have a written start-up, shutdown and malfunction plan, the affected EPPU asserts that it is also not required to submit reports related to that plan.

40 CFR §63.506(e)(6)(iv). Batch mass input limitation.

This paragraph requires the owner or operator to report once per year (i.e., in every other Periodic Report) the mass of HAPs or material input to the batch unit operation during the 12-month period covered by the current and previous Periodic Reports. In addition, the owner or operator must state whether the batch front-end process vent subject to the batch mass input limitation complied with the batch mass input limitation.

The affected EPPU indicated in its Notification of Compliance Status submittal that its determination of the group status of its set of batch front-end process vents was based on annualized emissions from maximum production of its single highest-HAP recipe. The result of this determination was that the affected EPPU's batch front-end process vents are Group 2. Consequently, the affected EPPU elected to comply with 40 CFR §63.487(g)(4) and §63.487(h). This compliance option does not require the affected EPPU to establish a batch mass input limitation. The affected EPPU made no recipe

40 CFR §63.506(e)(6)(ix). Reduced recordkeeping program.

This paragraph requires notification of the owners or operator's election to comply with the recordkeeping provisions of §63.506(h)(1) as an alternative to the continuous operating parameter monitoring and recordkeeping provisions of Subpart U. The affected EPPU has made no such election, and therefore this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(x). Further reduced recordkeeping provisions.

This paragraph requires notification of the owner or operator's election not to retain daily average or batch cycle daily average values as a further reduction in recordkeeping for monitored parameters that would otherwise be subject to the Subpart U provisions for continuous operating parameter monitoring and recordkeeping, as provided by §63.506(h)(2). The affected EPPU notes that owners or operators wishing to avail themselves of this option must first comply with §63.506(h)(1) for at least six months with no excursions. The affected EPPU has not elected to comply with §63.506(h)(1). Accordingly, the affected EPPU is not eligible for this alternative, and this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(xi). Quarterly reporting requirements for emission points included in an emissions average.

The affected EPPU is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in this paragraph does not apply.

40 CFR §63.506(e)(6)(xii). Quarterly reporting requirements for emission points or EPPUs not included in an emissions average.

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has had more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with the limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had no excursions as defined by this section

The second requirement under paragraph (e)(6)(xii) concerning quarterly reporting relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(*2*). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

AI/AI/CO 1100253294 91 951730

DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

RECEIVED

Air/Toxics & Inspection
Coordination Branch
6EN-A

Dupont Performance Elastomers
February 24, 2014

Dept. of Environmental Quality
Office of Environmental Compliance
Title V Program
P. O. Box 4312
Baton Rouge, LA 70821-4312
CERTIFIED MAIL NO. 7011 3500 0001 6350 0790

Re: 2013 – Annual and Semiannual Certifications
Agency Interest No. 38806
Permit Nos. 3000-V4, 2249-V6, 206-V2

As required under 40 CFR 70.6(c)(5)(iv), DuPont is submitting the 2013 Annual Certification of Compliance, Second Semiannual Report for 2013 and additional monitoring data required under the referenced permits. A line by line certification statement is available at our site for review.

Chloroprene Unit, Permit No. 3000-V4
Neoprene Unit, Permit No. 2249-V6
HCl Recovery Unit, Permit No. 206-V2

If you have any questions or need additional information you can contact me at (985) 536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Senior Environmental Consultant

Enclosures

cc: Environmental Protection Agency
Air Enforcement Section
1445 Ross Avenue
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7011 3500 0001 6350 0806

ATTACHMENT 1
2013 ANNUAL COMPLIANCE CERTIFICATIONS

Chloroprene Unit, Permit No. 3000-V4
Neoprene Unit, Permit No. 2249-V6
HCl Recovery Unit, Permit No. 206-V2

Louisiana DEQ Title V Annual Compliance Certification Form
DuPont, Chloroprene Unit

(Certification Part 1)

Applicable Reporting Period: 01/01/13 (mm/dd/yy) to 12/31/13 (mm/dd/yy)

Company and Facility Identification					
Permit Number	3000-V4	Parish	St. John the Baptist	Date Permit Issued	Apr. 26, 2012
Company Name	DuPont				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	586 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 2/21/14		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 2)

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier [A]	Permit Condition Number [B]	Applicable Compliance Requirement (Include Rule Citation) [C]	Method(s) or Other Means For Determining Compliance Status [D]	Permit Required Monitoring Frequency [E]	Compliance Status - See Guidance for Certification Part 2 [F]
		See attached Semiannual Reports			

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	No	No permit deviations were experienced during 2013.

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

A line by line certification statement is available at our site for review.

Louisiana DEQ Title V Annual Compliance Certification Form
DuPont, Neoprene Unit
(Certification Part 1)

Applicable Reporting Period: 01/01/13 (mm/dd/yy) to 12/31/13 (mm/dd/yy)

Company and Facility Identification					
Permit Number	2249-V6	Parish	St. John the Baptist	Date Permit Issued	June 16, 2009
Company Name	DuPont				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	586 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 2/21/14		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manger		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 2)

Title V Permit Number: 2249-V6 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier [A]	Permit Condition Number [B]	Applicable Compliance Requirement (Include Rule Citation) [C]	Method(s) or Other Means For Determining Compliance Status [D]	Permit Required Monitoring Frequency [E]	Compliance Status - See Guidance for Certification Part 2 [F]
		See attached Semiannual Reports			

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting

Title V Permit Number: 2249-V6 Company Name: DuPont

Facility Name: Pontchartrain Site AI Number: 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	Yes	One permit deviation was reported with the second semiannual report.

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

A line by line certification statement is available at our site for review.

Louisiana DEQ Title V Annual Compliance Certification Form
DuPont, HCl Unit

(Certification Part 1)

Applicable Reporting Period: 01/01/13 (mm/dd/yy) to 12/31/13 (mm/dd/yy)

Company and Facility Identification					
Permit Number	206-V2	Parish	St. John the Baptist	Date Permit Issued	March 14, 2011
Company Name	DuPont				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	586 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 2/21/14		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 2)

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier [A]	Permit Condition Number [B]	Applicable Compliance Requirement (Include Rule Citation) [C]	Method(s) or Other Means For Determining Compliance Status [D]	Permit Required Monitoring Frequency [E]	Compliance Status - See Guidance for Certification Part 2 [F]
		See attached Semiannual Reports			

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	Yes	One permit deviation was reported with the second semiannual report.

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

A line by line certification statement is available at our site for review.

ATTACHMENT 2
FIRST 2013 SEMIANNUAL REPORTS

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Applicable Reporting Period: 01/01/13 (mm/dd/yy) to 06/30/13 (mm/dd/yy)

Company and Facility Identification					
Permit Number	3000-V4	Parish	St. John the Baptist	Date Permit Issued	April 26, 2012
Company Name	DuPont				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	586 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 7/31/13		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Deviation Reporting

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	No	

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT046 (1117-1 DCB Storage Tanks Vent)	Toluene Chloroprene Non-tox VOCs	110 And State Only Spec. Condition # 2 & #3	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Continuous monitoring of temperature. Inspection of brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift.
EQT013 (1110-2A DCB Storage Tanks Vent - 1031 Area)	Chloroprene, Non-tox VOCs	57 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Continuous monitoring of temperature. Inspection of brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift.
EQT017 (1110-3 Isom Reactor Vent – North)	Toluene Chloroprene Non-tox VOCs	73 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Monitor and record temperatures once per shift. Inspect brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT017 (1110-3 Isom Reactor Vent – South)	Toluene Chloroprene Non-tox VOCs	73 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Monitor and record temperatures once per shift. Inspect brine lines once and pump pressure per shift.	Monitor and record temp. and brine lines once per shift.
HCl Scrubber	HCl	72, 74	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	Inspect and confirm scrubbers are working, once per shift.
EQT026 (1110-4 CD Vent Condenser)	Toluene Chloroprene Non-tox VOCs	100 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Continuous monitoring of temperature. Inspection of brine lines and pump pressure once per shift.	Monitor and record temp. and brine lines once per shift.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT026 (1110-4 CD Vent Condenser)	Toluene Chloroprene Non-tox VOCs	100 And Part 70 Spec. Condition # 2	40 CFR 63.100, 113(a)(3) and 113(d) Group 2 process vent with TRE between 1 and 4. Maintain average daily cooling media temperature at 10°C or below.	Continuous temperature monitored.	Daily average cooling media temperature.
EQT059 (1140-20 Aqueous Storage Vent Condenser)	Toluene Chloroprene Non-tox VOCs	134 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Monitor and record temperatures once per shift. Inspect brine lines and pump pressure once per shift.	Monitor and record temp. and brine lines once per shift.
EQT006 (1110-2 HCl Scrubber @ Refining Jets Vent)	HCl	11	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	Inspect and confirm scrubbers are working, once per shift.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT067 (7000-10A Monomer Flare)	Butadiene	171, 184 172, 173, 177	40 CFR63.11(b)(4) and LAC 33:III.1105 Opacity <20%, no visible emissions 40 CFR63.11(b)(5) Flame present at all times and monitored continuously	Once a shift the flare stack is inspected for smoke or other visible emissions The flare is equipped with a thermostat, the temperature is tracked continuously. An alarm will sound in the control room when the temperature goes below set limit.	Visual inspections Monitor temperature continuously
FUG001 (3-91 Fugitive Emissions)	Chloroprene, Toluene, Butadiene	364-385 278-363	This unit will comply with the applicable requirements of LAC 33:III.2121 This unit will comply with the applicable requirements of 40 CFR 63, Subpart H.	Components in organic service are monitored as required under LAC 33:III.2121 and 40 CFR 63, Subpart H. Reports are submitted to the State and EPA, and records are maintained on site for a period of three years.	Monitoring of components as stated on the referenced regulations.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT 0100 1110-25A.1	Particulates	213	LAC 33:III.1311.C Maintain opacity at $\leq$ 20%	Visual checks of stack when mixing stabilizer.	Monitor as needed.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			

ATTACHMENT I

Semiannual Monitoring Report
For the Period of January 1 to June 30, 2013

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT046 (1117-1 DCB Storage Tanks Vent)	110 And State Only Specific Conditions # 2 & #3	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The cooling media for this source is required to be monitored at the exit of the refrigeration machines. No exceedances on the cooling media temperature were experienced during this reporting period while the unit was in operation. Brine lines are monitored once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation.
EQT013 (1110-2A DCB Storage Tank Vent - 1031 Area)	57 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The cooling media for this source is required to be monitored at the exit of the refrigeration machines. No exceedances on the cooling media temperature were experienced while the unit was in operation. Brine lines are monitored once per shift and readings are recorded in the Turnover Database, Monomer-Chlorine Services Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation.

ATTACHMENT I (continued)

Semiannual Monitoring Report
For the Period of January 1 to June 30, 2013

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT017 (1110-3 Isom Reactor Vent – North)	73 And State Only Specific Condition # 2	Maintain cooling media temperature at 0°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Readings of the cooling media temperature and brine flow are taken once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation.
EQT017 (1110-3 Isom Reactor Vent – South)	73 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Readings of the cooling media temperature, brine flow and discharge pressure are taken once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.
EQT017 (1110-3 HCl Scrubber)	72, 74	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	This scrubber is inspected once a shift and readings recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.

ATTACHMENT I (continued)

Semiannual Monitoring Report
For the Period of January 1 to June 30, 2013

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT026 (1110-4 CD Vent Condenser)	100 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the brine pump outlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	No exceedances on the cooling media temperature were experienced during this reporting period while the unit was in operation. Pressure on the brine pumps was within the permit limits during this reporting period. Observations of the brine flow are taken once per shift and documented in the Turnover Database, Monomer-CD Synthesis Log. All readings were taken during this reporting period.
	100 And Part 70. Spec. Condition #2	40 CFR 63.100, 113(a)(3) and 113(d) Group 2 process vent with TRE between 1 and 4. Maintain cooling media temperature at 10°C or below.	The cooling media for this condenser was maintained below 10°C during this reporting period while the unit was in operation.
EQT059 (1140-20 Aqueous Storage Vent Condenser)	134 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the brine pump outlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The temperature of the cooling media was within the permit limits during this reporting period. Readings of the brine are taken once per shift and readings are recorded in the Turnover Database, Monomer-Brine Services Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation.
EQT006 (1110-2 HCl Scrubber @ Refining Jets Vent)	11	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	This scrubber is inspected once a shift and readings recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.

ATTACHMENT I (continued)

Semiannual Monitoring Report
For the Period of January 1 to June 30, 2013

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT067 (7000-10A Monomer Flare)	171, 184	Opacity <20%, no visible emissions	Flare visual readings are taken once per shift and recorded in the Turnover Database, Monomer-HCl Log. All readings were taken during this reporting period.
	172, 173, 177	Flame present at all times and monitored continuously	The flare is equipped with a thermostat and the temperature of the flare is monitored continuously. During this reporting period the only time the flame was not present was when the flare was down for maintenance while the units were down.
FUG001 (3-91 Fugitive Emissions)	364-385	This unit will comply with the applicable requirements of LAC 33:III.2121	Fugitive emissions monitoring is performed as required under these regulations.
	278-363	This unit will comply with the applicable requirements of 40 CFR 63, Subpart H.	
EQT 0100 1110-25A.1	213	LAC 33:III.1311.C Maintain opacity at ≤ 20%	This vent is visually inspected for opacity while mixing the stabilizer. This is the only operation of the system that could generate particulate emissions. All readings were taken during this reporting period.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Neoprene Unit
LaPlace, LA

Applicable Reporting Period: 01/01/13 to 06/30/13
mm/dd/yy mm/dd/yy

Company and Facility Identification					
Permit Number	2249-V6	Parish	St. John the Baptist	Date Permit Issued	June 16, 2009
Company Name	DuPont				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	586 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 7/31/13		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Neoprene Unit
LaPlace, LA

Deviation Reporting

Title V Permit Number: 2249-V6 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	No	

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Neoprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 2249-V6 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT 0193 1700-74 Bag Filter	Particulates	76	LAC 33:III.1311.C Maintain opacity at ≤ 20%	Visual checks of stack when mixing stabilizer.	Monitor as needed.
GRP 0012 1700-20 Refining Column	Toluene Chloroprene	131	LAC 33:III.2115.G	Alternate control requirement. The permittee is using a condenser as control device.	Monitor as needed.
RLP 0013 1700-14B3 Manhole Vent	Particulates	140	LAC 33:III.1311.C Maintain opacity at ≤ 20%	Visual checks of stack when mixing stabilizer.	Monitor as needed.
RLP0014 1700-2 Strippers Condenser Vent	Toluene Chloroprene Ammonia	143	40 CFR 63.114(c)(3) - Parameters Monitoring Requirements	Water Condenser – Maintain daily average cooling media temperature at 50°C or below.	Monitor and record temp. daily of the cooling water loop.
		143	40 CFR 63.114(c)(3) - Parameters Monitoring Requirements	CD Condenser - Maintain daily average cooling media temperature at 5°C or below.	Monitor and record temp. daily of the cooling brine loop.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Neoprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 2249-V6 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
RLP0014 1700-2 Strippers Condenser Vent	Toluene Chloroprene Ammonia	143	40 CFR 63.114(c)(3) - Parameters Monitoring Requirements	Common Condenser - Maintain daily average cooling media temperature at -15°C or below measured at the condenser brine inlet.	Monitor and record temp. daily at the condenser inlet.
RLP0015 1700-3 Kettles Condenser	Toluene Chloroprene	161	LAC 33:III.501.C.6 Terms and conditions to ensure compliance	Brine Condenser - Maintain daily average cooling media temperature at 5°C or below measured at the condenser brine outlet.	Monitor and record temp. daily.
		162	LAC 33:III.501.C.6 Terms and conditions to ensure compliance	Monitor valves on brine lines once per shift.	Monitor valves once per shift.
FUG0004 (3-91 Fugitive Emissions)	Toluene Chloroprene	95-99	Comply with the applicable requirements of LAC 33:III.2121 Comply with the applicable requirements of 40 CFR 63.502	Components in organic service are monitored as required under LAC 33:III.2121 and 40 CFR 63.502. Reports are submitted to the State and EPA, and records are maintained on site for a period of three years.	As required

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Neoprene Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 2249-V6 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			

ATTACHMENT I

Semiannual Monitoring Report
For the Period of January 1 to June 30, 2013

Neoprene Unit - Monitoring Requirements

Source Number	Permit Condition	Compliance Method	Status of Compliance
EQT 0193 1700-74 Bag Filter	76	LAC 33:III.1311.C Maintain opacity at ≤ 20%	This vent is visually inspected for opacity while mixing the stabilizer. This is the only operation of the system that could generate particulate emissions. Opacity was maintained within the permit limits during this reporting period.
RLP 0013 1700-14B3 Manhole Vent	140	LAC 33:III.1311.C Maintain opacity at ≤ 20%	This vent is visually inspected for opacity while mixing the stabilizer. This is the only operation of the system that could generate particulate emissions. Opacity was maintained within the permit limits during this reporting period.
RLP 0014 1700-2 Stripper Condenser Vent	143	Water Condenser – Maintain daily average cooling media temperature at 50°C or below. (Sampling point is at the cooling water loop - 17361053tt.) CD Condenser - Maintain daily average cooling media temperature at 5°C or below. (Sampling point is at the cooling brine loop -17361058tt.) Brine Condenser - Maintain daily average cooling media temperature at -15°C or below. Sampling point is located at the condenser brine inlet, it is monitored at the brine supply header. (BRNSUPHDRTMP)	The temperature data of the cooling media of these condensers is monitored by our computer data system. All data for this reporting period was reviewed and no exceedances were found while the strippers were in operation.
RLP0015 1700-3 Kettles Condenser	161	Brine Condenser - Maintain daily average cooling media temperature at 5°C or below. Sampling point is located at the condenser brine outlet. (1736081tt)	The temperature of the cooling brine is monitored by our computer system. All data for this reporting period was reviewed and no exceedances were found while the kettles were in operation.
	162	Inspect valves on the cooling media lines once per shift.	The cooling media lines are inspected once per shift and observations recorded in the Turnover Database. All readings were taken during this reporting period.
GRP 0012 1700-20 Refining Column	131	Maintain daily average temperature of the cooling media (at the receiver) at or below 10°C.	The temperature of the brine at the receiver is monitored through our computer data system. All data for this reporting period was reviewed and no exceedances were found while the Refining Column was in operation.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Applicable Reporting Period: 01/01/13 to 06/30/13
mm/dd/yy mm/dd/yy

Company and Facility Identification					
Permit Number	206-V2	Parish	St. John the Baptist	Date Permit Issued	March 14, 2011
Company Name	DuPont				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	586 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 7/31/13		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Reporting

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	No	

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT-82 1180-21	HCl	1	LAC 33:III.507.H.1.a Inspect the HCl Product Tank's Scrubber at least once per shift to confirm the scrubber is functioning properly.	This scrubber is inspected once per shift.	Once per shift
EQTs-83, 84 and 85 1180-21.1, 21.2 and 21.3	HCl	4, 6, 8	LAC 33:III.501.C.6 Maintain product acid concentration above 3% after the unit has been in operation for one hour. Perform product concentration tests at least once per shift.	Specific gravity tests are performed on the acid once per shift.	Once per shift
EQT86 7000-15	Particulates	19	LAC 33:III.1101.B Maintain opacity at $\leq$ 20%	Visual check of stack once per shift	Not specified
EQT86 7000-15	Particulates	20	LAC 33:III.1313.C Total suspended particulate $\leq$ 0.6 lb/MMBTU of heat input	Calculations available on site	Not specified
EQT86 7000-15	CO	22.1, Table 1	LAC 33:III.507.H.1.a Carbon Monoxide concentration – one hour rolling average corrected to 7% oxygen – 100 ppm (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of CO concentration.	Continuous

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.2	LAC 33:III.507.H.1.a Oxygen in the flue gas – 2% (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of oxygen concentration in the flue gas.	Not specified.
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.3, 28.B4, Table 1	LAC 33:III.507.H.1.a Combustion Chamber pressure 0.0 in. water (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of chamber pressure.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.4, 28.B1	LAC 33:III.507.H.1.a Combustion Chamber temperature 2561°F (1405°C) (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of chamber temperature.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.5, 28.B2	LAC 33:III.507.H.1.a Maximum waste flow to the burner system – 3,853 lbs/hr. Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of liquid feed rate.	Continuous

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.6, Table 1	LAC 33:III.507.H.1.a Dynawave scrubber differential pressure 14 in. water (minimum) Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	Continuous monitoring of the Dynawave scrubber differential pressure.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.7, 28.B5	LAC 33:III.507.H.1.a Dynawave scrubber – pH – 2.1 (min) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of the Dynawave scrubber pH.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.8	LAC 33:III.507.H.1.a The permittee shall test the automatic cut-off system monthly.	Automatic cut-off system is tested as a minimum on a monthly basis.	Monthly
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	23	LAC 33:III.507.H.1.a Vent Scrubber make up water – 300 lbs/hr (minimum one unit) 600 lbs/hr (minimum two units)	Continuous monitoring of vent scrubber make up water flow.	Not specified.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	24	LAC 33:III.507.H.1.a The permittee shall shut down the HCl Unit if any of the following occur. Loss of combustion air Power outage Loss of instrument air Loss of cooling water High temperature in the primary Absorber	Systems and procedures are in place to comply with this requirement.	As needed.
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	25	LAC 33:III.507.H.1.a Hazardous waste combusted at this unit is limited to the following rates – 40MM lb/yr Onsite Chlorinated Organic; 20 MM lb/yr Offsite Chlorinated Organic; 6 MM lbs/yr Miscellaneous.	Monthly reports are issued on the amount of waste combusted in this unit. Continuous monitoring of waste feed.	Yearly/Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NOx, CO, SO2	26	LAC 33:III.507.H.1.a The permittee shall test metal concentration in the chlorinated hydrocarbon feed as specified by the LDEQ Hazardous Waste Division.	Waste feed stream is sampled once per year as required under the Hazardous Waste Regulations.	Yearly
EQT86 7000-15	HCl, chlorine, VOCs, PM, NOx, CO, SO2	27	LAC 33:III.507.H.1.a The permittee shall comply with all applicable regulations of the LDEQ Hazardous Waste Division	This unit is inspected regularly by the LDEQ Hazardous Waste Division and it has been found in compliance with all regulations.	Continuous

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	28.A	LAC 33:III.507.H.1.a The permittee shall install, maintain and calibrate continuous CO and oxygen analyzers.	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	28.B3	LAC 33:III.507.H.1.a Combustion air flow shall be monitored continuously when the unit is in operation.	Continuous monitoring of combustion air flow.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	28.B6	LAC 33:III.507.H.1.a Dynawave scrubber pressure drop shall be monitored continuously when the unit is in operation.	Continuous monitoring of the Dynawave scrubber pressure drop.	Continuous
EQT86 7000-15	Particulates	30	LAC 33:III.5109.A Particulate concentrations in the flue gas shall not exceed 0.04 grains/dscf at 7% oxygen by volume.	Stack test was performed as required under the Hazardous Waste Regulations; this source meets this emission limit.	Not specified
EQT87 7000-17	Chloroprene, Toluene, HCl, VOCs	33	LAC 33:III.507.H.1.a Inspect the HCl Feed Tank's Scrubber to confirm scrubber is functioning properly.	Scrubber is inspected once per shift.	Once per shift
EQT90 2-74	Chloroprene, Toluene	45	LAC 33:III.501.C.6 Condenser water temperature of 55°F (12.8°C) – maximum	Monitoring of cooling media temperature.	Once per shift

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
FUG0003 3-96	Chloroprene, Toluene, VOCs	72-103	40 CFR 63 & LAC 33:III.2121 The HCl Unit shall comply with the fugitive emissions regulations of 40CFR264, Subpart BB (hazardous waste) and 40CFR 63 Subpart H under the HON.	A fugitive emission program has been implemented at this unit which complies with both set of regulations. Semi-annual reports are sent to the LDEQ.	Monitoring as required (weekly, monthly and/or annual.)
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Maximum Total System Hazardous Waste Feed Rate - 3,853 lbs/hr HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Minimum Combustion Gas Temperature 2561°F (1405°C) HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Maximum Feed Rate of Total Chlorine/Chloride – 2,030 lbs/hr HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Minimum Dynawave Scrubber Pressure Differential – 14 inches of water column HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Minimum Dynawave Scrubber Liquid-to-Gas Ratio – 107 gal/mscf HRA - AWFCO	Continuous monitoring.	Continuous

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Minimum Dynawave Scrubber effluent pH – 2.1 HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Maximum Combustion Air Flow Rate (indicator of combustion gas flow rate) 440,840 scfh HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Emission Limit for Carbon Monoxide (corrected to 7% O_2) – 100 ppmvd HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Maximum Pressure – Each Combustion Chamber – 0 inches of water column Instantaneous - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Minimum Atomization Flow Rate, Each Chamber – 4,000 scfh Instantaneous - AWFCO	Continuous monitoring.	Continuous

HRA – Hourly Rolling Average
AWFCO – Automatic Waste Feed Cutoff
ppmvd - parts per million by volume of a dry basis corrected to 7% oxygen

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			

ATTACHMENT I

Semiannual Monitoring Report
For the Period of January 1 to June 30, 2013

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT-82 1180-21	1	Inspect the HCl Product Tank's Scrubber at least once per shift to confirm the scrubber is functioning properly.	Inspections of the HCl Product Tank's Scrubber is documented in the Turnover Database, Monomer-Chlorine Services Log. All readings were taken during this reporting period.
EQTs-83, 84 and 85 1180-21.1, 21.2 and 21.3	4, 6, 8	Maintain product acid concentration above 3% after the unit has been in operation for one hour. Perform product concentration tests at least once per shift.	A review of the acid concentration readings for the reporting period shows the acid concentration was above 3% while the unit was in operation.
EQT86 7000-15	19	Maintain opacity at $\leq$ 20%	Visual checks on the HCl stack were conducted for opacity every shift. Opacity was within limits during all observations.
EQT86 7000-15	22.1	Carbon Monoxide concentration – one hour rolling average corrected to 7% oxygen – 100 ppm (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the CO_2 concentration shows the values were within permit limits while the unit was in operation.
EQT86 7000-15	22.2	Oxygen in the flue gas – 2% (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the oxygen concentration shows the oxygen concentration was within permit limits while the unit was in operation.
EQT86 7000-15	22.3, 28.B4	Combustion Chamber pressure 0.0 in. water (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Combustion Chamber pressure shows this pressure was within permit limits while the unit was in operation.
EQT86 7000-15	22.4, 28.B1, Table 1	Combustion Chamber temperature 2561°F (1405°C) (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Combustion Chamber temperature shows this temperature was within permit limits while the unit was in operation.
EQT86 7000-15	22.5, 28.B2, Table 1	Maximum waste flow to the burner system - 3,853 lbs/hr. Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the feed shows this unit operated within the permit limits for this reporting period.
EQT86 7000-15	22.6	Dynawave scrubber differential pressure 14 in. water (minimum) Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Dynawave scrubber shows the differential pressure was within the permit limits while the unit was in operation.

ATTACHMENT I

Semiannual Monitoring Report
For the Period of January 1 to June 30, 2013

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT86 7000-15	22.7, 28.B5, Table 1	Dynawave scrubber – pH – 2.1 (min) Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Dynawave scrubber shows the pH was within the permit limits while the unit was in operation.
EQT86 7000-15	22.8	The permittee shall test the automatic cut-off system monthly.	During the reporting period the automatic cut-off system was tested at least once per month.
EQT86 7000-15	23	Vent Scrubber make up water – 300 lbs/hr (minimum one unit) 600 lbs/hr (minimum two units)	A review of the continuous monitoring records of the vent scrubber make up water shows the make up water was within permit limits while the unit was in operation.
EQT86 7000-15	24	The permittee shall shut down the HCl Unit if any of the following occur. Loss of combustion air Power outage Loss of instrument air Loss of cooling water High temperature in the primary Absorber	Systems and procedures are in place to comply with this requirement.
EQT86 7000-15	25	Hazardous waste combusted at this unit is limited to the following rates – 40MM lbs/yr Onsite Chlorinated Organic; 20 MM lbs/yr Offsite Chlorinated Organic; 6 MM lbs/yr Miscellaneous.	The total amount of waste combusted at this unit during 2012 was 10.8 MM pounds.
EQT86 7000-15	26	The permittee shall test metal concentration in the chlorinated hydrocarbon feed as specified by the LDEQ Hazardous Waste Division.	The Hazardous Waste regulations require yearly sampling of the waste feed for metals. The last test performed shows the metal concentration within the permit limits.
EQT86 7000-15	28.A	The permittee shall install, maintain and calibrate continuous CO and oxygen analyzers.	This unit is equipped with CO and oxygen continuous analyzers.
EQT86 7000-15	28.B3	Combustion air flow shall be monitored continuously when the unit is in operation.	The combustion air flow was monitored continuously during this reporting period.
EQT86 7000-15	28.B6	Dynawave scrubber pressure drop shall be monitored continuously when the unit is in operation.	The Dynawave scrubber pressure drop was monitored continuously during this reporting period.
EQT86 7000-15	30	Particulate concentrations in the flue gas shall not exceed 0.04 grains/dscf at 7% oxygen by volume.	Stack test was performed as required under the Hazardous Waste Regulations; this source meets this emission limit.
EQT86 7000-15	Table 1	Maximum Feed Rate of Total Chlorine/Chloride – 2,030 lbs/hr	A review of the continuous monitoring records shows the maximum chlorine/chloride feed rate was within the permit limits while the unit was in operation.

ATTACHMENT I

Semiannual Monitoring Report
For the Period of January 1 to June 30, 2013

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT86 7000-15	Table 1	Minimum Dynawave Scrubber Liquid-to-Gas Ratio – 107 gal/mscf	A review of the continuous monitoring records shows the liquid to gas ratio was within the permit limits while the unit was in operation.
EQT86 7000-15	Table 1	Maximum Combustion Air Flow Rate (indicator of combustion gas flow rate) 440,840 scfh	A review of the continuous monitoring records shows the maximum combustion air flow rate was within the permit limits while the unit was in operation.
EQT86 7000-15	Table 1	Minimum Atomization Flow Rate, Each Chamber – 4,000 scfh	A review of the continuous monitoring records shows the atomization flow rate was within the permit limits while the unit was in operation.
EQT87 7000-17	33	Inspect the HCl Feed Tank's Scrubber to confirm scrubber is functioning properly.	Inspection of the HCl Feed Tank's scrubber is recorded in the Turnover Database, Monomer-HCl Log. All readings were taken during this reporting period.
EQT90 2-74	45	Condenser water temperature of 55°F (12.8°C) – maximum (Monitoring requirement, once per shift)	A review of the continuous monitoring records of the condenser water temperature shows this unit operated within the permit limits during this reporting period. See note 1.
FUG0003 3-96	72-103	The HCl Unit shall comply with the fugitive emissions regulations of 40CFR264, Subpart BB (hazardous waste) and 40CFR 63 Subpart H under the HON.	During the reporting period, fugitive emission monitoring was conducted as required by these regulations. Weekly visual inspections are recorded on form HCl-01. The records for the reporting period were audited, no records were found missing.

Note 1 -

On June 11, due to a power failure, the cooling media temperature of the condenser servicing source 2-74, was above the permit limits from 8:31 am to 1:26 pm (~5 hours). To minimize emissions to the air the tanks were stilled.

Tanks emissions for this period of time were calculated by using Tanks 4. Since the tanks were stilled, the only emissions from this source were breathing emissions. This program shows that emissions from the tanks were 0.091 lbs/hr. The current permit limit for this source is 0.43 lbs/hr. The permit limit was not exceeded during this period of time; therefore, we are not reporting this incident as a permit deviation.

ATTACHMENT 3
SECOND 2013 SEMI ANNUAL REPORTS

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Applicable Reporting Period: 07/01/13 (mm/dd/yy) to 12/31/13 (mm/dd/yy)

Company and Facility Identification					
Permit Number	3000-V4	Parish	St. John the Baptist	Date Permit Issued	April 26, 2012
Company Name	DuPont				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	586 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 2/28/14		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Deviation Reporting

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	No	

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT046 (1117-1 DCB Storage Tanks Vent)	Toluene Chloroprene Non-tox VOCs	110 And State Only Spec. Condition # 2 & #3	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Continuous monitoring of temperature. Inspection of brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift.
EQT013 (1110-2A DCB Storage Tanks Vent - 1031 Area)	Chloroprene, Non-tox VOCs	57 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Continuous monitoring of temperature. Inspection of brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift.
EQT017 (1110-3 Isom Reactor Vent – North)	Toluene Chloroprene Non-tox VOCs	73 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Monitor and record temperatures once per shift. Inspect brine lines and pump pressure once per shift.	Monitor and record temp., brine lines and pump pressure once per shift

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT017 (1110-3 Isom Reactor Vent – South)	Toluene Chloroprene Non-tox VOCs	73 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Monitor and record temperatures once per shift. Inspect brine lines once and pump pressure per shift.	Monitor and record temp. and brine lines once per shift.
HCl Scrubber	HCl	72, 74	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	Inspect and confirm scrubbers are working, once per shift.
EQT026 (1110-4 CD Vent Condenser)	Toluene Chloroprene Non-tox VOCs	100 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Continuous monitoring of temperature. Inspection of brine lines and pump pressure once per shift.	Monitor and record temp. and brine lines once per shift.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT026 (1110-4 CD Vent Condenser)	Toluene Chloroprene Non-tox VOCs	100 And Part 70 Spec. Condition # 2	40 CFR 63.100, 113(a)(3) and 113(d) Group 2 process vent with TRE between 1 and 4. Maintain average daily cooling media temperature at 10°C or below.	Continuous temperature monitored.	Daily average cooling media temperature.
EQT059 (1140-20 Aqueous Storage Vent Condenser)	Toluene Chloroprene Non-tox VOCs	134 And State Only Spec. Condition # 2	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Monitor and record temperatures once per shift. Inspect brine lines and pump pressure once per shift.	Monitor and record temp. and brine lines once per shift.
EQT006 (1110-2 HCl Scrubber @ Refining Jets Vent)	HCl	11	LAC 33:III.501.C.6 Terms and conditions to ensure compliance.	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	Inspect and confirm scrubbers are working, once per shift.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT067 (7000-10A Monomer Flare)	Butadiene	171, 184 172, 173, 177	40 CFR63.11(b)(4) and LAC 33:III.1105 Opacity <20%, no visible emissions 40 CFR63.11(b)(5) Flame present at all times and monitored continuously	Once a shift the flare stack is inspected for smoke or other visible emissions The flare is equipped with a thermostat, the temperature is tracked continuously. An alarm will sound in the control room when the temperature goes below set limit.	Visual inspections Monitor temperature continuously
FUG001 (3-91 Fugitive Emissions)	Chloroprene, Toluene, Butadiene	364-385 278-363	This unit will comply with the applicable requirements of LAC 33:III.2121 This unit will comply with the applicable requirements of 40 CFR 63, Subpart H.	Components in organic service are monitored as required under LAC 33:III.2121 and 40 CFR 63, Subpart H. Reports are submitted to the State and EPA, and records are maintained on site for a period of three years.	Monitoring of components as stated on the referenced regulations.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT 0100 1110-25A.1	Particulates	213	LAC 33:III.1311.C Maintain opacity at $\leq$ 20%	Visual checks of stack when mixing stabilizer.	Monitor as needed.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Chloroprene Unit
LaPlace, LA
SEE ATTACHMENT I FOR DETAILS

Deviation Summary Report (Continued)

Title V Permit Number: 3000-V4 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Chloroprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
						No permit deviations during this reporting period.	

ATTACHMENT I

Semiannual Monitoring Report
For the Period of July 1 to December 31, 2013

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT046 (1117-1 DCB Storage Tanks Vent)	110 And State Only Specific Conditions # 2 & #3	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The cooling media for this source is required to be monitored at the exit of the refrigeration machines. No exceedances on the cooling media temperature were experienced during this reporting period while the unit was in operation. Brine lines are monitored once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation.
EQT013 (1110-2A DCB Storage Tank Vent - 1031 Area)	57 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored after the refrigeration machines. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The cooling media for this source is required to be monitored at the exit of the refrigeration machines. No exceedances on the cooling media temperature were experienced while the unit was in operation. Brine lines are monitored once per shift and readings are recorded in the Turnover Database, Monomer-Chlorine Services Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation.

ATTACHMENT I (continued)

Semiannual Monitoring Report
For the Period of July 1 to December 31, 2013

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT017 (1110-3 Isom Reactor Vent – North)	73 And State Only Specific Condition # 2	Maintain cooling media temperature at 0°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Readings of the cooling media temperature and brine flow are taken once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation.
EQT017 (1110-3 Isom Reactor Vent – South)	73 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the condenser inlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	Readings of the cooling media temperature, brine flow and discharge pressure are taken once per shift and readings are recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.
EQT017 (1110-3 HCl Scrubber)	72, 74	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	This scrubber is inspected once a shift and readings recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.

ATTACHMENT I (continued)

Semiannual Monitoring Report
For the Period of July 1 to December 31, 2013

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT026 (1110-4 CD Vent Condenser)	100 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the brine pump outlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	No exceedances on the cooling media temperature were experienced during this reporting period while the unit was in operation. Pressure on the brine pumps was within the permit limits during this reporting period. Observations of the brine flow are taken once per shift and documented in the Turnover Database, Monomer-CD Synthesis Log. All readings were taken during this reporting period.
	100 And Part 70. Spec. Condition #2	40 CFR 63.100, 113(a)(3) and 113(d) Group 2 process vent with TRE between 1 and 4. Maintain cooling media temperature at 10°C or below.	The cooling media for this condenser was maintained below 10°C during this reporting period while the unit was in operation.
EQT059 (1140-20 Aqueous Storage Vent Condenser)	134 And State Only Specific Condition # 2	Maintain cooling media temperature at 5°C or below, monitored at the brine pump outlet. Monitor brine lines and discharge pressure on brine supply pumps once per shift.	The temperature of the cooling media was within the permit limits during this reporting period. Readings of the brine are taken once per shift and readings are recorded in the Turnover Database, Monomer-Brine Services Log. All readings were taken during this reporting period. Discharge pump pressure is monitored through our computer data gathering system. Pressure was maintained within the limits while the unit was in operation.
EQT006 (1110-2 HCl Scrubber @ Refining Jets Vent)	11	Visually inspect the scrubber, once per shift, to confirm that is functioning properly.	This scrubber is inspected once a shift and readings recorded in the Turnover Database, Monomer-Resom Log. All readings were taken during this reporting period.

ATTACHMENT I (continued)

Semiannual Monitoring Report
For the Period of July 1 to December 31, 2013

Chloroprene Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT067 (7000-10A Monomer Flare)	171, 184	Opacity <20%, no visible emissions	Flare visual readings are taken once per shift and recorded in the Turnover Database, Monomer-HCl Log. All readings were taken during this reporting period.
	172, 173, 177	Flame present at all times and monitored continuously	The flare is equipped with a thermostat and the temperature of the flare is monitored continuously. During this reporting period the only time the flame was not present was when the flare was down for maintenance while the units were down.
FUG001 (3-91 Fugitive Emissions)	364-385	This unit will comply with the applicable requirements of LAC 33:III.2121	Fugitive emissions monitoring is performed as required under these regulations.
	278-363	This unit will comply with the applicable requirements of 40 CFR 63, Subpart H.	
EQT 0100 1110-25A.1	213	LAC 33:III.1311.C Maintain opacity at $\leq$ 20%	This vent is visually inspected for opacity while mixing the stabilizer. This is the only operation of the system that could generate particulate emissions. All readings were taken during this reporting period.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Neoprene Unit
LaPlace, LA

Applicable Reporting Period: 07/01/13 (mm/dd/yy) to 12/31/13 (mm/dd/yy)

Company and Facility Identification					
Permit Number	2249-V6	Parish	St. John the Baptist	Date Permit Issued	June 16, 2009
Company Name	DuPont				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	586 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 2/21/14		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Neoprene Unit
LaPlace, LA

Deviation Reporting

Title V Permit Number: 2249-V6 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	Yes	One permit deviation was experienced during this reporting period and it is included with this report. (Page 5)

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Neoprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 2249-V6 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT 0193 1700-74 Bag Filter	Particulates	76	LAC 33:III.1311.C Maintain opacity at ≤ 20%	Visual checks of stack when mixing stabilizer.	Monitor as needed.
GRP 0012 1700-20 Refining Column	Toluene Chloroprene	131	LAC 33:III.2115.G	Alternate control requirement. The permittee is using a condenser as control device.	Monitor as needed.
RLP 0013 1700-14B3 Manhole Vent	Particulates	140	LAC 33:III.1311.C Maintain opacity at ≤ 20%	Visual checks of stack when mixing stabilizer.	Monitor as needed.
RLP0014 1700-2 Strippers Condenser Vent	Toluene Chloroprene Ammonia	143	40 CFR 63.114(c)(3) - Parameters Monitoring Requirements	Water Condenser – Maintain daily average cooling media temperature at 50°C or below.	Monitor and record temp. daily of the cooling water loop.
		143	40 CFR 63.114(c)(3) - Parameters Monitoring Requirements	CD Condenser - Maintain daily average cooling media temperature at 5°C or below.	Monitor and record temp. daily of the cooling brine loop.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Neoprene Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 2249-V6 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
RLP0014 1700-2 Strippers Condenser Vent	Toluene Chloroprene Ammonia	143	40 CFR 63.114(c)(3) - Parameters Monitoring Requirements	Common Condenser - Maintain daily average cooling media temperature at -15°C or below measured at the condenser brine inlet.	Monitor and record temp. daily at the condenser inlet.
RLP0015 1700-3 Kettles Condenser	Toluene Chloroprene	161	LAC 33:III.501.C.6 Terms and conditions to ensure compliance	Brine Condenser - Maintain daily average cooling media temperature at 5°C or below measured at the condenser brine outlet.	Monitor and record temp. daily.
		162	LAC 33:III.501.C.6 Terms and conditions to ensure compliance	Monitor valves on brine lines once per shift.	Monitor valves once per shift.
FUG0004 (3-91 Fugitive Emissions)	Toluene Chloroprene	95-99	Comply with the applicable requirements of LAC 33:III.2121 Comply with the applicable requirements of 40 CFR 63.502	Components in organic service are monitored as required under LAC 33:III.2121 and 40 CFR 63.502. Reports are submitted to the State and EPA, and records are maintained on site for a period of three years.	As required

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, Neoprene Unit
LaPlace, LA

Deviation Summary Report (Continued)

Title V Permit Number: 2249-V6 **Company Name:** DuPont

Facility Name: Pontchartrain Site, Neoprene Unit **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
1700-5 GRP0008	9/10/13	1:50 pm	9/11/13	5:50 am	16	A relief valve was left open for an extended period of time. Approximately 53 pounds of chloroprene were released during this incident.	Upon discovery, the valve was closed.

ATTACHMENT I

Semiannual Monitoring Report
For the Period of July 1 to December 31, 2013

Neoprene Unit - Monitoring Requirements

Source Number	Permit Condition	Compliance Method	Status of Compliance
EQT 0193 1700-74 Bag Filter	76	LAC 33:III.1311.C Maintain opacity at ≤ 20%	This vent is visually inspected for opacity while mixing the stabilizer. This is the only operation of the system that could generate particulate emissions. Opacity was maintained within the permit limits during this reporting period.
RLP 0013 1700-14B3 Manhole Vent	140	LAC 33:III.1311.C Maintain opacity at ≤ 20%	This vent is visually inspected for opacity while mixing the stabilizer. This is the only operation of the system that could generate particulate emissions. Opacity was maintained within the permit limits during this reporting period.
RLP 0014 1700-2 Stripper Condenser Vent	143	Water Condenser – Maintain daily average cooling media temperature at 50°C or below. (Sampling point is at the cooling water loop - 17361053tt.) CD Condenser - Maintain daily average cooling media temperature at 5°C or below. (Sampling point is at the cooling brine loop -17361058tt.) Brine Condenser - Maintain daily average cooling media temperature at -15°C or below. Sampling point is located at the condenser brine inlet, it is monitored at the brine supply header. (BRNSUPHDRTMP)	The temperature data of the cooling media of these condensers is monitored by our computer data system. All data for this reporting period was reviewed and no exceedances were found while the strippers were in operation.
RLP0015 1700-3 Kettles Condenser	161	Brine Condenser - Maintain daily average cooling media temperature at 5°C or below. Sampling point is located at the condenser brine outlet. (1736081tt)	The temperature of the cooling brine is monitored by our computer system. All data for this reporting period was reviewed and no exceedances were found while the kettles were in operation.
	162	Inspect valves on the cooling media lines once per shift.	The cooling media lines are inspected once per shift and observations recorded in the Turnover Database. All readings were taken during this reporting period.
GRP 0012 1700-20 Refining Column	131	Maintain daily average temperature of the cooling media (at the receiver) at or below 10°C.	The temperature of the brine at the receiver is monitored through our computer data system. All data for this reporting period was reviewed and no exceedances were found while the Refining Column was in operation.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Applicable Reporting Period: 07/01/13 to 12/31/13
mm/dd/yy mm/dd/yy

Company and Facility Identification					
Permit Number	206-V2	Parish	St. John the Baptist	Date Permit Issued	March 14, 2011
Company Name	DuPont				
Facility Name	Pontchartrain Site			Agency Interest Number	38806
Mailing Address	586 Highway 44				
City	LaPlace	State	Louisiana	Zip Code	70068-6908
Contact Person	Doris B. Grego	Phone #	(985) 536-5437	Fax #	(985) 536-5423
Principal Facility Product/Business	Manufacture of Chloroprene and Neoprene				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)	Walter L. Glenn 2/2/14		
Responsible Official (typed)	Walter L. Glenn	Date	
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Reporting

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Question	Response (Yes/No)	If the deviations have been previously reported, please reference below the report and date of the report.
Are there any instances of deviation from permit requirements being reported with this semiannual monitoring report? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report."	Yes	One permit deviation was experienced during this reporting period and it is included with this report. (Page 10)

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must contain the information necessary to complete the "Deviation Summary Report" present. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in the "Deviation Summary Report."

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT-82 1180-21	HCl	1	LAC 33:III.507.H.1.a Inspect the HCl Product Tank's Scrubber at least once per shift to confirm the scrubber is functioning properly.	This scrubber is inspected once per shift.	Once per shift
EQTs-83, 84 and 85 1180-21.1, 21.2 and 21.3	HCl	4, 6, 8	LAC 33:III.501.C.6 Maintain product acid concentration above 3% after the unit has been in operation for one hour. Perform product concentration tests at least once per shift.	Specific gravity tests are performed on the acid once per shift.	Once per shift
EQT86 7000-15	Particulates	19	LAC 33:III.1101.B Maintain opacity at ≤ 20%	Visual check of stack once per shift	Not specified
EQT86 7000-15	Particulates	20	LAC 33:III.1313.C Total suspended particulate ≤ 0.6 lb/MMBTU of heat input	Calculations available on site	Not specified
EQT86 7000-15	CO	22.1, Table 1	LAC 33:III.507.H.1.a Carbon Monoxide concentration – one hour rolling average corrected to 7% oxygen – 100 ppm (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of CO concentration.	Continuous

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.2	LAC 33:III.507.H.1.a Oxygen in the flue gas – 2% (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of oxygen concentration in the flue gas.	Not specified.
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.3, 28.B4, Table 1	LAC 33:III.507.H.1.a Combustion Chamber pressure 0.0 in. water (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of chamber pressure.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.4, 28.B1	LAC 33:III.507.H.1.a Combustion Chamber temperature 2561°F (1405°C) (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of chamber temperature.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.5, 28.B2	LAC 33:III.507.H.1.a Maximum waste flow to the burner system – 3,853 lbs/hr. Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of liquid feed rate.	Continuous

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.6, Table 1	LAC 33:III.507.H.1.a Dynawave scrubber differential pressure 14 in. water (minimum) Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	Continuous monitoring of the Dynawave scrubber differential pressure.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.7, 28.B5	LAC 33:III.507.H.1.a Dynawave scrubber – pH – 2.1 (min) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	Continuous monitoring of the Dynawave scrubber pH.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	22.8	LAC 33:III.507.H.1.a The permittee shall test the automatic cut-off system monthly.	Automatic cut-off system is tested as a minimum on a monthly basis.	Monthly
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	23	LAC 33:III.507.H.1.a Vent Scrubber make up water – 300 lbs/hr (minimum one unit) 600 lbs/hr (minimum two units)	Continuous monitoring of vent scrubber make up water flow.	Not specified.

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	24	LAC 33:III.507.H.1.a The permittee shall shut down the HCl Unit if any of the following occur. Loss of combustion air Power outage Loss of instrument air Loss of cooling water High temperature in the primary Absorber	Systems and procedures are in place to comply with this requirement.	As needed.
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	25	LAC 33:III.507.H.1.a Hazardous waste combusted at this unit is limited to the following rates – 40MM lb/yr Onsite Chlorinated Organic; 20 MM lb/yr Offsite Chlorinated Organic; 6 MM lbs/yr Miscellaneous.	Monthly reports are issued on the amount of waste combusted in this unit. Continuous monitoring of waste feed.	Yearly/Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NOx, CO, SO2	26	LAC 33:III.507.H.1.a The permittee shall test metal concentration in the chlorinated hydrocarbon feed as specified by the LDEQ Hazardous Waste Division.	Waste feed stream is sampled once per year as required under the Hazardous Waste Regulations.	Yearly
EQT86 7000-15	HCl, chlorine, VOCs, PM, NOx, CO, SO2	27	LAC 33:III.507.H.1.a The permittee shall comply with all applicable regulations of the LDEQ Hazardous Waste Division	This unit is inspected regularly by the LDEQ Hazardous Waste Division and it has been found in compliance with all regulations.	Continuous

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	28.A	LAC 33:III.507.H.1.a The permittee shall install, maintain and calibrate continuous CO and oxygen analyzers.	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	28.B3	LAC 33:III.507.H.1.a Combustion air flow shall be monitored continuously when the unit is in operation.	Continuous monitoring of combustion air flow.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	28.B6	LAC 33:III.507.H.1.a Dynawave scrubber pressure drop shall be monitored continuously when the unit is in operation.	Continuous monitoring of the Dynawave scrubber pressure drop.	Continuous
EQT86 7000-15	Particulates	30	LAC 33:III.5109.A Particulate concentrations in the flue gas shall not exceed 0.04 grains/dscf at 7% oxygen by volume.	Stack test was performed as required under the Hazardous Waste Regulations; this source meets this emission limit.	Not specified
EQT87 7000-17	Chloroprene, Toluene, HCl, VOCs	33	LAC 33:III.507.H.1.a Inspect the HCl Feed Tank's Scrubber to confirm scrubber is functioning properly.	Scrubber is inspected once per shift.	Once per shift
EQT90 2-74	Chloroprene, Toluene	45	LAC 33:III.501.C.6 Condenser water temperature of 55°F (12.8°C) – maximum	Monitoring of cooling media temperature.	Once per shift

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
FUG0003 3-96	Chloroprene, Toluene, VOCs	72-103	40 CFR 63 & LAC 33:III.2121 The HCl Unit shall comply with the fugitive emissions regulations of 40CFR264, Subpart BB (hazardous waste) and 40CFR 63 Subpart H under the HON.	A fugitive emission program has been implemented at this unit which complies with both set of regulations. Semi-annual reports are sent to the LDEQ.	Monitoring as required (weekly, monthly and/or annual.)
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Maximum Total System Hazardous Waste Feed Rate - 3,853 lbs/hr HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Minimum Combustion Gas Temperature 2561°F (1405°C) HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Maximum Feed Rate of Total Chlorine/Chloride – 2,030 lbs/hr HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Minimum Dynawave Scrubber Pressure Differential – 14 inches of water column HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Minimum Dynawave Scrubber Liquid-to-Gas Ratio – 107 gal/mscf HRA - AWFCO	Continuous monitoring.	Continuous

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Pollutant(s)	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Minimum Dynawave Scrubber effluent pH – 2.1 HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Maximum Combustion Air Flow Rate (indicator of combustion gas flow rate) 440,840 scfh HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Emission Limit for Carbon Monoxide (corrected to 7% O_2) – 100 ppmvd HRA - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Maximum Pressure – Each Combustion Chamber – 0 inches of water column Instantaneous - AWFCO	Continuous monitoring.	Continuous
EQT86 7000-15	HCl, chlorine, VOCs, PM, NO_x, CO, SO_2	Appendix A, Table 1	Minimum Atomization Flow Rate, Each Chamber – 4,000 scfh Instantaneous - AWFCO	Continuous monitoring.	Continuous

HRA – Hourly Rolling Average
AWFCO – Automatic Waste Feed Cutoff
ppmvd - parts per million by volume of a dry basis corrected to 7% oxygen

Louisiana DEQ Title V Semiannual Monitoring Form
DuPont, HCl Recovery Unit
LaPlace, LA

Deviation Summary Report (Continued)

Title V Permit Number: 206-V2 **Company Name:** DuPont

Facility Name: Pontchartrain Site **AI Number:** 38806

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
EQT86 7000-15	9/9/13	5:21 am	9/9/13	6:02 am	41 min	Vent Scrubber ran without make up water due to problems with the water level. Permit limits were not exceeded.	Corrected the problems with the water level.
EQT86 7000-15	9/9/13	6:41 am	9/9/13	8:16 am	95 min	Vent Scrubber ran without make up water due to problems with the water level. Permit limits were not exceeded.	Corrected the problems with the water level.

ATTACHMENT I

Semiannual Monitoring Report
For the Period of July 1 to December 31, 2013

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT-82 1180-21	1	Inspect the HCl Product Tank's Scrubber at least once per shift to confirm the scrubber is functioning properly.	Inspections of the HCl Product Tank's Scrubber is documented in the Turnover Database, Monomer-Chlorine Services Log. All readings were taken during this reporting period.
EQTs-83, 84 and 85 1180-21.1, 21.2 and 21.3	4, 6, 8	Maintain product acid concentration above 3% after the unit has been in operation for one hour. Perform product concentration tests at least once per shift.	A review of the acid concentration readings for the reporting period shows the acid concentration was above 3% while the unit was in operation.
EQT86 7000-15	19	Maintain opacity at ≤ 20%	Visual checks on the HCl stack were conducted for opacity every shift. Opacity was within limits during all observations.
EQT86 7000-15	22.1	Carbon Monoxide concentration – one hour rolling average corrected to 7% oxygen – 100 ppm (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the CO_2 concentration shows the values were within permit limits while the unit was in operation.
EQT86 7000-15	22.2	Oxygen in the flue gas – 2% (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the oxygen concentration shows the oxygen concentration was within permit limits while the unit was in operation.
EQT86 7000-15	22.3, 28.B4	Combustion Chamber pressure 0.0 in. water (maximum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Combustion Chamber pressure shows this pressure was within permit limits while the unit was in operation.
EQT86 7000-15	22.4, 28.B1, Table 1	Combustion Chamber temperature 2561°F (1405°C) (minimum) Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Combustion Chamber temperature shows this temperature was within permit limits while the unit was in operation.
EQT86 7000-15	22.5, 28.B2, Table 1	Maximum waste flow to the burner system - 3,853 lbs/hr. Waste feed must be shutoff if this parameter drifts out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the feed shows this unit operated within the permit limits for this reporting period.
EQT86 7000-15	22.6	Dynawave scrubber differential pressure 14 in. water (minimum) Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Dynawave scrubber shows the differential pressure was within the permit limits while the unit was in operation.

ATTACHMENT I

Semiannual Monitoring Report
For the Period of July 1 to December 31, 2013

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT86 7000-15	22.7, 28.B5, Table 1	Dynawave scrubber – pH – 2.1 (min) Waste feed must be shutoff if these parameters drift out of permitted range for longer than 5 minutes.	A review of the continuous monitoring records of the Dynawave scrubber shows the pH was within the permit limits while the unit was in operation.
EQT86 7000-15	22.8	The permittee shall test the automatic cut-off system monthly.	During the reporting period the automatic cut-off system was tested at least once per month.
EQT86 7000-15	23	Vent Scrubber make up water – 300 lbs/hr (minimum one unit) 600 lbs/hr (minimum two units)	A review of the continuous monitoring records of the vent scrubber make up water shows the make up water was within permit limits except for a period of time on September 9, 2013.
EQT86 7000-15	24	The permittee shall shut down the HCl Unit if any of the following occur. Loss of combustion air Power outage Loss of instrument air Loss of cooling water High temperature in the primary Absorber	Systems and procedures are in place to comply with this requirement.
EQT86 7000-15	25	Hazardous waste combusted at this unit is limited to the following rates – 40MM lbs/yr Onsite Chlorinated Organic; 20 MM lbs/yr Offsite Chlorinated Organic; 6 MM lbs/yr Miscellaneous.	The total amount of waste combusted at this unit during 2013 was 14.35 MM pounds.
EQT86 7000-15	26	The permittee shall test metal concentration in the chlorinated hydrocarbon feed as specified by the LDEQ Hazardous Waste Division.	The Hazardous Waste regulations require yearly sampling of the waste feed for metals. The last test performed shows the metal concentration within the permit limits.
EQT86 7000-15	28.A	The permittee shall install, maintain and calibrate continuous CO and oxygen analyzers.	This unit is equipped with CO and oxygen continuous analyzers.
EQT86 7000-15	28.B3	Combustion air flow shall be monitored continuously when the unit is in operation.	The combustion air flow was monitored continuously during this reporting period.
EQT86 7000-15	28.B6	Dynawave scrubber pressure drop shall be monitored continuously when the unit is in operation.	The Dynawave scrubber pressure drop was monitored continuously during this reporting period.
EQT86 7000-15	30	Particulate concentrations in the flue gas shall not exceed 0.04 grains/dscf at 7% oxygen by volume.	Stack test was performed as required under the Hazardous Waste Regulations; this source meets this emission limit.
EQT86 7000-15	Table 1	Maximum Feed Rate of Total Chlorine/Chloride – 2,030 lbs/hr	A review of the continuous monitoring records shows the maximum chlorine/chloride feed rate was within the permit limits while the unit was in operation.

ATTACHMENT I

Semiannual Monitoring Report
For the Period of July 1 to December 31, 2013

HCl Recovery Unit - Monitoring Requirements

Source Number	Permit Condition	Requirement	Status of Compliance
EQT86 7000-15	Table 1	Minimum Dynawave Scrubber Liquid-to-Gas Ratio – 107 gal/mscf	A review of the continuous monitoring records shows the liquid to gas ratio was within the permit limits while the unit was in operation.
EQT86 7000-15	Table 1	Maximum Combustion Air Flow Rate (indicator of combustion gas flow rate) 440,840 scfh	A review of the continuous monitoring records shows the maximum combustion air flow rate was within the permit limits while the unit was in operation.
EQT86 7000-15	Table 1	Minimum Atomization Flow Rate, Each Chamber – 4,000 scfh	A review of the continuous monitoring records shows the atomization flow rate was within the permit limits while the unit was in operation.
EQT87 7000-17	33	Inspect the HCl Feed Tank's Scrubber to confirm scrubber is functioning properly.	Inspection of the HCl Feed Tank's scrubber is recorded in the Turnover Database, Monomer-HCl Log. All readings were taken during this reporting period.
EQT90 2-74	45	Condenser water temperature of 55°F (12.8°C) – maximum (Monitoring requirement, once per shift)	A review of the continuous monitoring records of the condenser water temperature shows this unit operated within the permit limits during this reporting period.
FUG0003 3-96	72-103	The HCl Unit shall comply with the fugitive emissions regulations of 40CFR264, Subpart BB (hazardous waste) and 40CFR 63 Subpart H under the HON.	During the reporting period, fugitive emission monitoring was conducted as required by these regulations. Weekly visual inspections are recorded on form HCl-01. The records for the reporting period were audited, no records were found missing.

ATTACHMENT 4
ADDITIONAL INFORMATION REQUIRED UNDER
3000-V4
2249-V6
206-V2

CHLOROPRENE UNIT
PERMIT 3000-V4, AI # 38806
ADDITIONAL INFORMATION REQUIRED
WITH THE ANNUAL CERTIFICATION

Sate Only Specific Conditions – 2

Total hours that each of the maximum cooling media temperatures were exceeded

Source 1117-1 – No exceedances on the cooling media of this source were experienced during this reporting period while the unit was in operation.

Source 1110-2A – No exceedances on the cooling media of this source were experienced during this reporting period while the unit was in operation.

Source 1110-3 – No exceedances on the cooling media of this source were experienced during this reporting period while the unit was in operation.

Source 1110-4 – No exceedances on the cooling media of this source were experienced during this reporting period while the unit was in operation.

Source 1140-20 - No exceedances on the cooling media of this source were experienced during this reporting period while the unit was in operation.

Sate Only Specific Conditions – 3

Total hours that each of the maximum cooling media temperatures were exceeded

Source 1117-1 – No exceedances on the cooling media of this source were experienced during this reporting period while the unit was in operation.

Specific Requirement 10 – Source 1110-2 – List the hours that the scrubber was not in operation. – Scrubber was in service while the unit was in operation.

Specific Requirement 65 – Source 1110-3 – List the hours that the scrubber was not in operation. – Scrubber was in service while the unit was in operation.

NEOPRENE UNIT
AI# 38806, PERMIT NO. 2249-V6
ADDITIONAL INFORMATION REQUIRED
WITH THE ANNUAL CERTIFICATION

GRP 0007 – 1700-25A CAP EMISSIONS
Specific Requirements 102, 104, 111, 112, 118
TONS PER YEAR

CAP Emission Point	Emission Points	Emission Limits	Actual Emissions
1700-5	1700-5.3 thru 5.8	2.77	1.5
1700-14B	1700-14B.1 thru B.3	0.72	0.35
1700-25A	1700-25 thru 28 and 1700-45 thru 48	69.17	30.7
1700-50	1700-50.1 thru 50.6	0.59	0.05
1700-63	1700-63.1 thru 63.12	2.18	0.87

GRP 0011- Specific Requirement 120 - Total 2013 Neoprene Production – 69.7 million pounds

1700-3 – Kettles Condenser - Specific Requirement 163
Total number of hours during which the maximum temperature was exceeded during 2013 – The cooling brine temperate was within the permit limits while the kettles were venting.

1700-20 Refining Column – Specific Requirement 135
Hours of operation in 2013 - 7,805 hours
2013 Emissions –
Chloroprene – 7,800 pounds
Toluene - < 10 pounds

HCL UNIT
AI# 38806, PERMIT NO. 206-V2

ADDITIONAL INFORMATION REQUIRED
WITH THE ANNUAL CERTIFICATION

1180-21 – HCL Product Tank's Scrubber - Specific Requirement 1
Hours the scrubber did not operate – Scrubber was in service while the unit was in operation.

7000-17 – HCL Feed Tank's Scrubber - Specific Requirement 26
Hours the scrubber did not operate – Scrubber was in service while the unit was in operation.

AI/AI/CO 11002532949 1

L 804 w/ 12

DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

RECEIVE

JUL 16 2014

Air/Toxics & Inspection Coordination Branch 6EN-A

July 14, 2014

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, La. 70821-4312

CERTIFIED MAIL NO. 7011 3500 0001 6350 0943

Re: DuPont – Pontchartrain Site – AI#38806
Polymers and Resins Group I MACT (40 CFR Part 63, Subpart U)
Periodic Report (non-LDAR) for November 16, 2013 through May 15, 2014

Enclosed is the non-equipment leak Periodic Report under 40 CFR Part 63, Subpart U, of the Polymers & Resins Group I MACT regulation, for the DuPont Neoprene Plant located in LaPlace, Louisiana. As required by 40 CFR §63.506(e)(6)(i), this non-equipment leak Periodic Report covers the 6-month period beginning November 16, 2013 and ending on May 15, 2014.

A detailed analysis of the Periodic Report elements in 40 CFR §63.506(e)(6) is attached. Those applicable and not applicable (N/A) to the Neoprene Unit are noted.

If you have any questions or need additional information, you can contact me at (985) 536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P. E.
Senior Environmental Consultant

Enclosures

cc: U.S. EPA Region 6
Air Enforcement Section
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7011 3500 0001 6350 0950

DUPONT

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

TITLE V OPERATING PERMIT NO. 2249-V7

P&R I MACT – PERIODIC REPORT (non-LDAR)

STARTING DATE: NOVEMBER 16, 2013

ENDING DATE: MAY 15, 2014

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Walter L. Glenn
Responsible Official's Title	Plant Manager
Signature	Walter L. Glenn
Date Signed	7/14/2014

Analysis of Periodic Reporting Requirement of Polymers & Resins Group I MACT, 40 CFR Part 63, Subpart U, §63.506(e)(6)
Periodic Report (non-LDAR) for DuPont
Pontchartrain Site, LaPlace, Louisiana
Reporting period beginning on November 16, 2013 and ending on May 15, 2014

40 CFR §63.506(e)(6)(i). Frequency of reporting and time period covered.

This paragraph refers to paragraphs (e)(6)(xi) and (e)(6)(xii) of §63.506 as potentially applicable exceptions to the requirement to submit semiannual Periodic Reports. Paragraph (e)(6)(xi) addresses emission points included in an emissions average. The affected Elastomer Product Process Unit (EPPU) is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in paragraph (e)(6)(xi) is not applicable (N/A).

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with these limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had one control or recovery devices for a particular emission point or process section that had excursions, as defined in §63.505(g).

The second requirement concerning quarterly reporting under paragraph (e)(6)(xii) relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(*2*). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

In the absence of a requirement to submit quarterly reports, Periodic Reports are required semiannually by paragraph (e)(6)(i). The first report was required to be submitted no later than 240 days after the date the Notification of Compliance Status was due. The Notification of Compliance Status submittal deadline was November 16, 2001. The date 240 days after the November 16, 2001 date is July 14, 2002. In addition, the first Periodic Report was required to address the six-month period beginning on the date that the Notification of Compliance Status was due. Periodic Report #1 (non-LDAR) thus covered the reporting period beginning on November 16, 2001, and ending on May 15, 2002. This Periodic Report covers the six-month reporting period, beginning on November 16, 2013 and ending on May 15, 2014.

<u>40 CFR §63.506(e)(6)(ii)</u>. Content of Periodic Reports under certain conditions.

If during the reporting period, the affected source experienced none of the compliance exceptions or activities identified in §§63.506(e)(6)(iii) through (e)(6)(ix), then the Periodic Report is to take the short form. In this case, the Periodic Report should contain a statement that there were no compliance exceptions as specified in paragraphs (e)(6)(iii) through (e)(6)(ix) of §63.506 for the six-month period covered by the report, and that none of the activities specified in those same paragraphs occurred during the same six-month period.

<u>40 CFR §63.506(e)(6)(iii)</u>. Content of Periodic Reports under all other conditions.

This paragraph references specific information to be provided in the Periodic Report if the conditions in the preceding paragraph (e)(6)(ii) were not met during the reporting period. The paragraph applies to affected sources subject to §63.484 through 63.501 for any emission point. This equates to affected sources subject to Subpart U and having specific applicable requirements for any combination of storage vessels, continuous front-end process vents, batch front-end process vents, back-end process vents, or process wastewater. The affected EPPU identified its specific applicable requirements in its Notification of Compliance Status submittal.

The affected EPPU notes that §63.501(a) identifies the applicable requirements for maintenance wastewater as §63.105(a). The applicable requirements for maintenance wastewater do not include any requirement to report information in the Periodic Reports required by §63.506(e)(6).

40 CFR §63.506(e)(6)(iii)(A). Cross-references to specific reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Cross-reference (40 CFR)	Required Information and Applicability
§63.122(a)(4) for storage vessels	Relates to Group 1 storage vessels (N/A)
§§63.117(a)(3), 63.118(f), and 63.485(s)(5) for continuous front-end process vents	§63.117(a)(3) relates to TRE determinations or performance tests conducted after the Notification of Compliance Status (NoCS) has been submitted. - The affected EPPU had no process changes during this reporting period that required a recalculation of the TRE index value. - The affected EPPU conducted no performance tests during this reporting period. §63.118(f)(1) relates to daily average values of monitored parameters for all operating days when daily average values recorded were outside the levels established in the NoCS or the Title V operating permit - The affected EPPU had no such days during this reporting period. §63.118(f)(2) relates to Group 1 emission points with excursions caused by insufficient monitoring data (N/A). §63.118(f)(3) relates to the times and durations of periods recorded when the vent stream is diverted from its control device through a bypass line (N/A). §63.118(f)(4) relates to periods recorded when the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line valve was checked out (N/A). §63.118(f)(5) relates to periods when all pilot flames of a flare were absent (N/A). §63.118(f)(6) relates to carbon bed regeneration cycles with recorded parameters outside the levels established in the NoCS or the Title V operating permit (N/A). §63.485(s)(5) relates to Group 1 continuous front-end process vents controlled using an internal combustion engine (N/A).
§63.492 for batch front-end process vents and aggregate batch vent streams	§63.492(a) relates to information required in the NoCS (N/A). §63.492(b) relates to process changes causing a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. §63.492(c) relates to process changes that – - cause a Group 2 batch front-end process vent with annual emissions less than 11,800 kg/year to have annual emissions greater than or equal to 11,800 kg/year but not changing the Group 2 status of the batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. - or require redetermination of the batch mass input limitation (N/A). §63.492(d) specifies process changes for which reporting is not required (N/A).

Cross-reference (40 CFR)	Required Information and Applicability
§63.492 for batch front-end process vents and aggregate batch vent streams (continued)	§63.492(e) relates to information required in the Precompliance Report for alternative control devices or alternative monitoring parameters (N/A). §63.492(f) relates to affected sources required to monitor bypass lines around control devices per §63.489(d) (N/A).
§63.494 for back-end process operations	Total amount of Neoprene manufactured between May 2013 and April 2013 = 58.28 MM pounds. HAP emissions from the back end process = 52,690 pounds. Residual Factor 0.00090
§63.104(f)(2) for heat exchange systems	Addresses reporting requirements if the delay-of-repair provisions are invoked (N/A). Note: The affected EPPU has heat exchange systems meeting the condition specified in §63.104(a)(1)—that the heat exchange systems are operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side. Accordingly, the requirements of §63.104(a)(1) do not apply to the affected EPPU.
§63.146(c) – (g) for process wastewater	§63.146(c) relates to waste management units that receive, manage, or treat Group 1 process wastewater stream(s) or residual(s) removed from Group 1 process wastewater stream(s) (N/A). §63.146(d) relates to treatment processes for Group 1 process wastewater streams and/or residuals removed from Group 1 wastewater streams (N/A). §63.146(e) relates to control devices for organic HAP emissions from Group 1 process wastewater streams (N/A). §63.146(f) relates to owners or operators who have obtained approval to use an alternative treatment process or control device or to monitor a set of alternative parameters and therefore have alternate reporting requirements (N/A). §63.146(g) relates to extensions of time to empty and remove a Group 1 process wastewater tank equipped with a floating roof from service for inspection or repairs to the floating roof per §63.133(e)(2) or for control equipment repair per §63.133(h) (N/A)

40 CFR §63.506(e)(6)(iii)(B). Reporting requirements for excursions.

This paragraph requires the owner or operator of the affected EPPU to report the daily average values or batch cycle daily average values of monitored parameters for each excursion.

Excursions are defined by paragraphs (g) and (h) of §63.505. As noted above, §63.505(h) does not apply to the affected EPPU but §63.505(g) does. In addition, for excursions caused by lack of monitoring data, the owner or operator is to specify the start time and duration of each period when monitoring data were not collected.

On April 23, 2014 from 4:10 pm to 8:16 pm, the temperature of the cooling media of the CD Condenser was above the permit limit. This condenser services the stripper system.

40 CFR §63.506(e)(6)(iii)(C). [Reserved.]

40 CFR §63.506(e)(6)(iii)(D). Additional reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Citation (40 CFR §63.506)	Required Information and Applicability
(e)(6)(iii)(D)(*1*)	Supplements to the Emissions Averaging Plan, if any, per paragraph (e)(4)(iii) (N/A).
(e)(6)(iii)(D)(*2*)	Notification if a process change is made that changes the group status of any emission point from Group 2 to Group 1. - The affected EPPU had no such process changes during the reporting period.
(e)(6)(iii)(D)(*3*)	Notification of addition of one or more emission points or EPPUs to the affected source, with description and notification of the group status of the additional emission point or of all emission points in the EPPU. - The affected EPPU added no emission points or EPPUs during the reporting period.
(e)(6)(iii)(D)(*4*)	For EPPUs producing styrene-butadiene rubber by an emulsion process, notification of changes in standard operating procedures affecting carbon disulfide concentration in crumb dryer exhaust (N/A).
(e)(6)(iii)(D)(*5*)	Changes in the identity of the treatment facility or transferee receiving process wastewater streams for treatment pursuant to §63.132(g) (N/A).

40 CFR §63.506(e)(6)(iii)(E). Start-up, shutdown, and malfunction reports.

[Please note that the U.S. Environmental Protection Agency amended 40 CFR §63.10(d)(5)(i) and the final rule was published in the Federal Register on May 30, 2003 (68 FR 32586). This notice requires the submittal of a Shutdown and Malfunction Report with the Periodic Reports. The Neoprene Unit has procedures in place that meet the requirements of this regulation. Since this facility does not have a Group 1 source, it is our understanding, based on 40 CFR §63.506(b)(i), that a Shutdown and Malfunction Report is not required.]

This paragraph refers to the information required by paragraph (b)(1)(ii) of §63.506. In turn, §63.506(b)(1)(ii) requires semiannual start-up, shutdown and malfunction reports to be submitted on the same schedule as the non-LDAR Periodic Reports and to include the information specified in §63.10(d)(5)(i).

The affected EPPU notes, however, that paragraph (b)(1) of 40 CFR §63.506 does not require the owner or operator of an affected source to include Group 2 emission points in the written start-up, shutdown and malfunction plan unless the Group 2 emission points are included in an emissions average. Further, this paragraph limits the start-up, shutdown and malfunction plan requirement to control devices for equipment leaks and makes it optional for other equipment. The affected EPPU has no Group 1 emission points and no control devices for equipment leaks. Accordingly, the affected EPPU asserts that it is not required to develop and implement a written start-up, shutdown and malfunction plan pursuant to §63.506(b)(1).

Furthermore, §63.506(b)(1) states in its final sentence that reports related to the plan shall be submitted as specified in paragraph (b)(1)(ii) of §63.506. If the affected EPPU is not required by §63.506(b)(1) to have a written start-up, shutdown and malfunction plan, the affected EPPU asserts that it is also not required to submit reports related to that plan.

40 CFR §63.506(e)(6)(iv). Batch mass input limitation.

This paragraph requires the owner or operator to report once per year (i.e., in every other Periodic Report) the mass of HAPs or material input to the batch unit operation during the 12-month period covered by the current and previous Periodic Reports. In addition, the owner or operator must state whether the batch front-end process vent subject to the batch mass input limitation complied with the batch mass input limitation.

The affected EPPU indicated in its Notification of Compliance Status submittal that its determination of the group status of its set of batch front-end process vents was based on annualized emissions from maximum production of its single highest-HAP recipe. The result of this determination was that the affected EPPU's batch front-end process vents are Group 2. Consequently, the affected EPPU elected to comply with 40 CFR §63.487(g)(4) and §63.487(h). This compliance option does not require the affected EPPU to establish a batch mass input limitation. The affected EPPU made no recipe

changes during the reporting period that changed the identity or the composition of the single highest-HAP recipe on which this determination was based.

The election of the affected EPPU to comply with §63.487(h) for its batch front-end process vents invokes the reporting requirements of paragraphs (a)(5), (a)(6), and (b) of §63.492. The information in paragraphs (a)(5) and (a)(6) was included in the affected EPPU's Notification of Compliance Status submitted November 16, 2001, and is not required to be included in Periodic Reports.

§63.492(b) relates to process changes that cause a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. As noted in the table presented in the discussion above of reporting requirements under 40 CFR §63.506(e)(6)(iii)(A), the affected EPPU made no process changes during the reporting period that caused a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. Therefore, this Periodic Report is not required to include a notification and description of any process changes [as specified in 40 CFR §63.492(b).]

<u>40 CFR §63.506(e)(6)(v)</u>. Reporting of performance tests.

This paragraph specifies the information required for performance tests conducted during the reporting period. The affected EPPU did not conduct any performance tests during the period covered by this Periodic Report.

<u>40 CFR §63.506(e)(6)(vi)</u>. Change in primary product.

This paragraph requires notification of any change in the primary product of the affected EPPU. The affected EPPU did not change its primary product during the period covered by this Periodic Report.

<u>40 CFR §63.506(e)(6)(vii)</u>. Changes in predominant use determinations for storage tanks assigned to an affected EPPU.

The storage tanks at the affected EPPU did not require a predominant use determination. Therefore, this reporting requirement is not applicable (N/A).

<u>40 CFR §63.506(e)(6)(viii)</u>. Changes in predominant use determinations for recovery operations equipment assigned to an affected EPPU.

The recovery operations equipment at the affected EPPU did not require a predominant use determination. Therefore, this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(ix). Reduced recordkeeping program.

This paragraph requires notification of the owners or operator's election to comply with the recordkeeping provisions of §63.506(h)(1) as an alternative to the continuous operating parameter monitoring and recordkeeping provisions of Subpart U. The affected EPPU has made no such election, and therefore this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(x). Further reduced recordkeeping provisions.

This paragraph requires notification of the owner or operator's election not to retain daily average or batch cycle daily average values as a further reduction in recordkeeping for monitored parameters that would otherwise be subject to the Subpart U provisions for continuous operating parameter monitoring and recordkeeping, as provided by §63.506(h)(2). The affected EPPU notes that owners or operators wishing to avail themselves of this option must first comply with §63.506(h)(1) for at least six months with no excursions. The affected EPPU has not elected to comply with §63.506(h)(1). Accordingly, the affected EPPU is not eligible for this alternative, and this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(xi). Quarterly reporting requirements for emission points included in an emissions average.

The affected EPPU is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in this paragraph does not apply.

40 CFR §63.506(e)(6)(xii). Quarterly reporting requirements for emission points or EPPUs not included in an emissions average.

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has had more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with the limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had one excursions as defined by this section

The second requirement under paragraph (e)(6)(xii) concerning quarterly reporting relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(*2*). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

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DuPont
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068-6908

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Coordination Branch
6EN-A

July 24, 2014

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7015 1520 0001 4738 4497

Re: DuPont – Pontchartrain Site – AI#38806
40 CFR Part 63, Subpart FFFF
Periodic Report – ACR Unit

Enclosed is the Periodic Report, as required under 40 CFR Part 63, Subpart FFFF, the MON MACT regulation, for DuPont's ACR Unit located in LaPlace, Louisiana. This Periodic Report covers the period of January 1 to June 30, 2015.

If you have any questions or comments, you can contact me at 985-536-5437 or at Doris.B.Grego@dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Senior Environmental Consultant

cc: U.S. EPA Region 6, Air Enforcement Section
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7015 1520 0001 4738 4503

DUPONT

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

ACR UNIT

40 CFR Part 63, Subpart FFFF – PERIODIC REPORT (non-LDAR)

STARTING DATE: JANUARY 1, 2015

ENDING DATE: JUNE 30, 2015

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Ivan D. Caldwell, Plant Manager
Signature	Ivan D. Caldwell
Date Signed	July 21, 2015

Periodic Report for the ACR Unit
40 CFR Part 63, Subpart FFFF, §63.2520(e)
DuPont
Pontchartrain Site, LaPlace, Louisiana

40 CFR §63.2520(e)(1) Company Name and Address

DuPont
586 Highway 44
LaPlace, La. 70068
Contact – Doris B. Grego
Phone – 985-536-5437
e-mail – doris.b.grego@dupont.com

40 CFR §63.2520(e)(2) Statement by Responsible Official

Included with this submittal.

40 CFR §63.2520(e)(3) Reporting Period

Reporting period beginning on January 1, 2015 and ending on June 30, 2015.

40 CFR §63.2520(e)(4) SSM Malfunctions

There were no SSM in which excess emissions occurred during this reporting period.

40 CFR §63.2520(e)(5) Deviations

No deviations from the permitted limits or permit conditions were experienced during this reporting period.

40 CFR §63.2520(e)(6) CEMS

This facility is not required to have CEMs.

40 CFR §63.2520(e)(7) Operating Scenarios

There were no new operating scenarios since the notification of compliance status was submitted.

40 CFR §63.2520(e)(8) Process Unit Groups

No new process units were added to this facility.

40 CFR §63.2520(e)(9) Other Records

Heat Exchange Systems (63.104(f)(2): This facility does not have heat exchange systems that meet this definition.

Wastewater (63.146(c), (d) and (e): This facility does not have wastewater streams which contain listed HAPs.

Equipment Leaks: If complying with Subpart H, submit the information listed in §63.182(d). If complying with Subpart UU, submit the information listed in §63.1039(b). This facility has selected to comply with Subpart H. The information required under §63.182(d) is included with this report.

Closed Vent Systems and Control Devices: This facility does not have close vent systems.

Floating Roof Tanks: This facility does not have floating roof tanks.

40 CFR §63.2520(e)(10) Notification of Process Change

There were no process changes to this facility during this reporting period that meet the requirements of this subpart.

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DUPONT

DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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July 29, 2014

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7011 3500 0001 6350 0981

Re: DuPont – Pontchartrain Site – AI#38806
40 CFR Part 63, Subpart FFFF
Periodic Report – ACR Unit

Enclosed is the Periodic Report, as required under 40 CFR Part 63, Subpart FFFF, the MON MACT regulation, for DuPont's ACR Unit located in LaPlace, Louisiana. This Periodic Report covers the period of January 1 to June 30, 2014.

If you have any questions or comments, you can contact me at 985-536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Senior Environmental Consultant

cc: U.S. EPA Region 6, Air Enforcement Section
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7011 3500 0001 6350 0998

DUPONT

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

ACR UNIT

40 CFR Part 63, Subpart FFFF – PERIODIC REPORT (non-LDAR)

STARTING DATE: JANUARY 1, 2014

ENDING DATE: JUNE 30, 2014

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Walter L. Glenn, Plant Manager
Signature	Walter L. Glenn
Date Signed	7/28/14

Periodic Report for the ACR Unit
40 CFR Part 63, Subpart FFFF, §63.2520(e)
DuPont
Pontchartrain Site, LaPlace, Louisiana

40 CFR §63.2520(e)(1) Company Name and Address

DuPont
586 Highway 44
LaPlace, La. 70068
Contact – Doris B. Grego
Phone – 985-536-5437
e-mail – doris.b.grego@usa.dupont.com

40 CFR §63.2520(e)(2) Statement by Responsible Official

Included with this submittal.

40 CFR §63.2520(e)(3) Reporting Period

Reporting period beginning on January 1, 2014 and ending on June 30, 2014.

40 CFR §63.2520(e)(4) SSM Malfunctions

There were no SSM in which excess emissions occurred during this reporting period.

40 CFR §63.2520(e)(5) Deviations

No deviations from the permitted limits or permit conditions were experienced during this reporting period.

40 CFR §63.2520(e)(6) CEMS

This facility is not required to have CEMs.

40 CFR §63.2520(e)(7) Operating Scenarios

There were no new operating scenarios since the notification of compliance status was submitted.

40 CFR §63.2520(e)(8) Process Unit Groups

No new process units were added to this facility.

40 CFR §63.2520(e)(9) Other Records

Heat Exchange Systems (63.104(f)(2): This facility does not have heat exchange systems that meet this definition.

Wastewater (63.146(c), (d) and (e): This facility does not have wastewater streams which contain listed HAPs.

Equipment Leaks: If complying with Subpart H, submit the information listed in §63.182(d). If complying with Subpart UU, submit the information listed in §63.1039(b). This facility has selected to comply with Subpart H. The information required under §63.182(d) is included with this report.

Closed Vent Systems and Control Devices: This facility does not have close vent systems.

Floating Roof Tanks: This facility does not have floating roof tanks.

40 CFR §63.2520(e)(10) Notification of Process Change

There were no process changes to this facility during this reporting period that meet the requirements of this subpart.

AI/AI/CO

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DuPont
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

August 13, 2014

CERTIFIED MAIL NO. 7011 2970 0002 5796 2112

Dept. of Environmental Quality
Office of Compliance
P. O. Box 4312
Baton Rouge, La 70821-4312

Re: DuPont Pontchartrain Site Semi-Annual Fugitive Emissions Consolidated Source Agreement Periodic Report (LDEQ Agency Interest Numbers 1101 & 38806)

As required in accordance with the Fugitive Emissions Consolidated Source Agreement dated November 18, 2013, and Letter of Response dated December 20, 2013, enclosed is the Periodic Report for the DuPont Pontchartrain Site located in LaPlace, Louisiana. This Periodic Report includes the reporting requirements for the semi-annual (first half of 2014) period of January 1, 2014 through June 30, 2014.

According to the Fugitive Emissions Consolidated Source Agreement, which was effective January 1, 2014, the entire DuPont Pontchartrain Site will comply with the HON (40 CFR Subpart H) as the most stringent and guiding fugitive rule. The reporting requirements were also consolidated with this Agreement and the Fugitive Emissions Consolidated Source Agreement Periodic Report as enclosed is being submitted in accordance with 40 CFR Subpart H (40 CFR 63.182.d). The Fugitive Emissions Consolidated Source Agreement Periodic Report will be the only fugitive periodic report submitted since it fulfills all other fugitive program reporting requirements. Previously, the facility submitted multiple periodic reports for differing time periods for each process unit according to various applicable reporting requirements. Previous reports included Subpart H-HON, Subpart FFFF, Subpart U-P & R I, and LAC 33:III.2121 periodic reports for the ACR, Chloroprene, Neoprene, Diamines, and HCL Recovery Units if applicable to those rules. Also to note, since HON Subpart H is now the governing rule for all of the components on-site, the data within the Periodic Report has been consolidated and summarized. In other words, process unit data is not listed independently, but is listed as part of the DuPont Pontchartrain Site's data within the Periodic Report.

If you have any questions or need any additional information, please contact me at (985) 536-5438 or at Anthony.J.Fugarino@dupont.com.

Sincerely,

Anthony Fugarino

Anthony Fugarino
DuPont SHE Consultant

Enclosures

cc: CERTIFIED MAIL NO. 7011 2970 0002 5796 2129
US EPA Region 6
Routine Air Compliance Report Submission
Compliance and Enforcement Division
Mail Number: 6EN-AA
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

FUGITIVE EMISSIONS CONSOLIDATED SOURCE AGREEMENT PERIODIC REPORT
DuPont Pontchartrain Site
January 1, 2014 through June 30, 2014

1. NAME OF FACILITY: DuPont Pontchartrain Site

PROCESS UNITS: All on-site units (Chloroprene, ACR, Neoprene, HCL Recovery, and Diamines Manufacturing Units) per Fugitive Emissions Consolidated Source Agreement

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2014 FIRST QUARTER	2014 SECOND QUARTER
(i)	No. valves found leaking	9	0
	Percent valves leaking	0.21	0
	Total no. monitored	4363	4231
(ii)	No. leaking valves not repaired	0	0
	No. valves not Repairable	0	0

		2014 JAN	FEB	MAR	APR	MAY	JUN
(iii)	No. pumps leaking §63.163 (P_L)	0	0	0	0	0	0
	Total no. pumps leaking §63.182(d)(2)(iii)	1	0	0	0	0	0
	Percent leaking pumps (%P_L) (Includes "P_L" leaks only)	0	0	0	0	0	0
	Total no. monitored	145	145	140	140	137	136
(iv)	No. leaking pumps not repaired	0	0	0	0	0	0
(v)	No. compressors found leaking	0	0	0	0	0	0
(vi)	No. leaking compressors No repaired	0	0	0	0	0	0
(vii)	No. agitators found leaking	2	0	0	1	0	0
(viii)	No. leaking agitators not repaired	0	0	0	0	0	0

FUGITIVE EMISSIONS CONSOLIDATED SOURCE AGREEMENT PERIODIC REPORT
DuPont Pontchartrain Site
January 1, 2014 through June 30, 2014

2. SUMMARY INFORMATION (cont.)
[40 CFR §63.182 (d)(2)]

		2014	
		FIRST QUARTER	SECOND QUARTER
(ix)	No. leaking connectors	1	2
	Percent connectors leaking	0.10	0.08
	Total no. monitored	998	2488
(x)	Reserved		
(xi)	No. leaking connectors not repaired	0	0
	No. connectors not repairable	0	0
(xii)	Reserved		

(xiii) Explain delay of repairs, if any, and why process unit shutdown was technically infeasible, if appropriate. The table below summarizes all components that were found leaking and had their repair delayed during this reporting period. Components that cannot be repaired without a process unit shutdown will be repaired during the next process unit shutdown. "Shutdown – delay of repair" components were delayed because we were not able to bypass or isolate them for repair. A process unit shutdown is required to repair these components in a safe, responsible manner. Components that have been isolated will be repaired before returning to service.

Unit	Chemical State	ID/Tag Number	Type of Component	Delay of Repair Reason
Diamines	Heavy Liquid	50808802	Connector	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50811039	Pump	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	1527166101	Connector	Isolated & not in HAP Service
Diamines	Heavy Liquid	1522150208	Pump	Isolated & not in HAP Service
Diamines	Heavy Liquid	15221305FT	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	1522150417	Connector	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	1522150611	Pump	Isolated & not in HAP Service
Diamines	Heavy Liquid	1522120103	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50808803	Pump	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50813265	Connector	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50811022	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50806755	Connector	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50811022-1	Connector	Repair infeasible w/o shutdown

2. SUMMARY INFORMATION (cont.)
[40 CFR §63.182 (d)(2)]

(xiii) continued

Unit	Chemical State	ID/Tag Number	Type of Component	Delay of Repair Reason
Diamines	Heavy Liquid	50809467	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50809467-1	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50809467-2	Valve	Repair infeasible w/o shutdown
Chloroprene	Light Liquid	12614	Pump	Isolated & not in HAP Service

All components summarized in the table above were discovered leaking through sensory methods.

(xiv) Results of monitoring to comply with:

63.164 (i) – The Pontchartrain Site monitors compressors monthly instead of annually. Compressor monitoring results are summarized above in sections v and vi of this periodic report. No compressors were found leaking during this period as a result of this monitoring.

63.165 (a) – Gas/vapor service pressure relief devices are monitored once a month to insure they operate below the 500 ppm limit. No gas/vapor service pressure relief devices were found leaking during this period as a result of this monitoring.

63.172 (f) – Annual Closed Vent Visual Inspections were conducted in the fourth quarter of 2013, the previous semi-annual reporting period. No leaks were found during these visual inspections. One hundred twenty-seven (127) closed vent system components were monitored this period and none were found leaking.

(xv) Not applicable

(xvi) Connectors Monitoring Alternatives – Since the implementation of the fugitive emission program, the Pontchartrain Site has used the monitoring alternative described under 63.174(c)(1)(ii).

(xvii) Not applicable

FUGITIVE EMISSIONS CONSOLIDATED SOURCE AGREEMENT PERIODIC REPORT
DuPont Pontchartrain Site
January 1, 2014 through June 30, 2014

3. CONSOLIDATED SOURCE AGREEMENT REQUIREMENT

Summary of all monitoring performed within the Reporting Period at the Pontchartrain Site

Equipment Category	Number of Components Monitored
Connector	3,696
Valve	8,603
Pump	843
Compressor	7
Instrumentation system	79
Agitator	136
Pressure relief device	470
Closed vent system	127
Combustion chamber	2

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DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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6EN-A

November 5, 2014

Dept. of Environmental Quality
Office of Compliance
P. O. Box 4312
Baton Rouge, La 70821-4312
CERTIFIED MAIL NO. 7011 3500 0001 6350 1162

RE: HON Periodic Report – AI# - 38806

As required under 40 CFR 63.152(c), DuPont is submitting the HON Periodic Report for the Chloroprene Unit, located in LaPlace, Louisiana. This report covers the compliance period of March 19, 2014 to September 18, 2014. Also included with this report is the Startup, Shutdown, and Malfunction Report required under 40 CFR 63.10(d)(5).

If you have any questions or need additional information, you can contact me at (985) 536-5437 or by email at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Senior Environmental Consultant

Enclosures

cc: US EPA Region 6
Compliance Assurance and Enforcement Division
Mail Number: 6EN-A
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7011 3500 0001 6350 1179

DUPONT
CHLOROPRENE UNIT
PERIODIC STARTUP, SHUTDOWN, AND MALFUNCTION
CERTIFICATION REPORT
PER CFR 63.10(d)(5)(i)

As required under 40 CFR 63.6(e)(3), DuPont developed Startup, Shutdown, and Malfunctions plans for the Chloroprene Unit. This unit is covered under the SOCMI HON regulations. During the reporting period of March 19 to September 18, 2014, all process equipment and pollution control devices were operated in a manner consistent with good air pollution control practices for minimizing emissions to the levels required by all relevant SOCMI HON standards. During this period, all actions taken during startup, shutdown, or malfunction of any process, were consistent with the procedures detailed in the Startup, Shutdown and Malfunctions plans for this unit which are based on the unit's Standard Operating Procedures (SOPs).

I certify that the procedures described in the Startup, Shutdown and Malfunctions plans for the Chloroprene Unit were followed.

Ivan D. Caldwell, Plant Manager

Nov. 3, 2014
Date

DuPont, LaPlace, Louisiana
Chloroprene Unit – AI# 38806
Semi-Annual Periodic Report
March 19, 2014 to September 18, 2014

DuPont is submitting this Periodic Report for the Chloroprene Unit as required under 40 CFR 63.152(c)(2). This report addresses the information specified in 63.117 and 63.118 for process vents, 63.122 for storage vessels, 63.129 and 130 for transfer operations, and 63.146 for process wastewater.

PROCESS VENTS

40 CFR 63.117(a)(7)

Group 2 Vents with a TRE index value greater than 1.0 but less than 4.0.

1. Monitoring Requirements - This facility has one Group 2 process vent with a TRE between 1 and 4. The current Title V Permit (3000-V5), Part 70 Specific Condition No. 2, sets the monitoring requirement for this source.

   "The permittee shall keep the cooling media (brine) temperature of the CD Reactor System's Strippers (A and B lines) condenser, Emission Point 1110-4, below 10°C to maintain a TRE above 1. The maximum temperature shall be below 10°C to ensure Group 2 process vent status. Daily averages of this temperature shall be maintained. Any average temperature outside the range established (10°C) shall be reported in the Periodic Report required under 63.152(c)."

   During this reporting period the daily average temperature of the cooling media on the condenser servicing source 1110-4 was below 10°C while the unit was in operation. No exceedances were experienced during this reporting period.

40 CFR 63.118(f)

This facility has one Group 1 process vent – the Mole Sieve Vent (7000-10A.5), this vent discharges to the Monomer flare. This flare is equipped with a heat-sensing device; presence of the flame is recorded through a process monitoring and control system. Flare is required to have a lit pilot while the Mole Sieve Vent (intermittent flow) is venting.

(1) Daily average values of monitored parameters outside the ranges established in the Notification of Compliance Status.

Not applicable. This vent is controlled with a flare, per 40 CFR 63.118(a)(5), records of the times and duration of all periods during which the pilot flame is absent shall be kept rather than daily averages.

(2) For Group 1 points, duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data.

None.

(3) Times and duration of all periods when the vent stream was diverted from the control device through a bypass line.

Not applicable, this control device does not have a bypass line that can be used to divert the vent stream.

(4) Periods in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line was checked out.

Not applicable, see item 3 above.

(5) Times and duration of all periods in which the pilot flame was absent:

During the following period the flare was down while the site conducted one of the semiannual shutdowns. All units were down, there was no venting to the flare during this period of time.

6/8/14 @ 2:54 am until 6/12/14 @ 1:00 am

(6) Reports on carbon bed regeneration cycles.

Not applicable, carbon beds are not used to treat Group 1 vents.

<u>40 CFR 63.118(g)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent to become a Group 1 process vent.

<u>40 CFR 63.118(h)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent with a TRE greater than 4 to become a Group 2 process vent with a TRE less than 4.

<u>40 CFR 63.118(i)</u>

There were no process changes made during this reporting period that caused a Group 2 process vent with a flow rate less than 0.005 scm per minute, to become a Group 2 process vent with a flow rate of 0.005 scm per minute or greater, and a TRE value less than or equal to 4.

40 CFR 63.118(j)

There were no process changes made during this reporting period that caused a Group 2 process vent with an organic HAP concentration of less than 50 ppm to become a Group 2 process vent with a HAP concentration of 50 ppm or grater and a TRE value less than or equal to 4.

STORAGE VESSELS

40 CFR 63.122 – The Chloroprene Unit does not have Group 1 storage vessels.

TRANSFER OPERATIONS

40 CFR 63.129 & 130 – The Chloroprene Unit does not have Group 1 transfer operations.

PROCESS WASTEWATER

40 CFR 63.146 – Not applicable. This facility is in compliance with the HON Wastewater provisions. All process wastewater sources at this unit are Group 2. No changes in the average flow rate or average VOHAP concentration for the streams occurred during the reporting period.

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DuPont Protection Technologies
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068

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Certified Mail No. 7006 2150 0003 4644 8536

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

November 5, 2014

RE: SOCMI HON Subpart G Periodic Report
Period: Mar 19, 2014 - Sep 18, 2014
Facility: DuPont DPT in LaPlace, LA

Enclosed is the SOCMI Hon Subpart G Periodic Report for DuPont's p-phenylenediamine (Diamines) Unit located in LaPlace, Louisiana. This report is required per 40 CFR 63.152 (c) and covers the compliance period of March 19, 2014 to September 18, 2014. This Periodic Report also includes a signed Startup, Shutdown, and Malfunction Certification as required per 40 CFR 63.10(d)(5)(i) of Subpart A

A copy of this report is also being sent to LDEQ. If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
Environmental Coordinator

Enclosures:

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

E. I. DU PONT DE NEMOURS & COMPANY, INC.
PONTCHARTRAIN SITE
LA PLACE, LOUISIANA
P-PHENYLENEDIAMINES (DIAMINES) UNIT

COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
PERIODIC STARTUP, SHUTDOWN, MALFUNCTION
AND CERTIFICATION REPORT PER PARA 63.10(d)(5)(i)

Semi-Annual Periodic Certification for
March 19, 2014 through September 18, 2014

All actions taken by E. I. DuPont de Nemours & Co., Inc., located at the Pontchartrain Site, during startup, shutdown, or malfunction of any process or air pollution control device equipment were consistent with the procedures detailed in the Startup, Shutdown, and Malfunction Plan. This plan was compiled as required per 40 CFR 63.6(e)(3) for the Diamines Unit which produces p-phenylenediamine and is therefore subject to applicable requirements of SOCMI HON regulations. During the reporting of March 19, 2014 through September 18, 2014, all process equipment and air pollution control device equipment was operated in a manner consistent with good air pollution control practices for minimizing emissions to the levels required by all relevant SOCMI HON standards.

I certify that the procedures described in the Startup, Shutdown, and Malfunction Plan were followed:

Signature: Ivan Caldwell
Ivan Caldwell, Plant Manager

Date: Nov. 5, 2014

(If the procedures described in the Startup, Shutdown, and Malfunction Plan were not followed, prepare and attach a Startup, Shutdown, and Malfunction Plan Variance Report.)

E. I. DU PONT DE NEMOURS & COMPANY, INC.
PONTCHARTRAIN SITE
LA PLACE, LOUISIANA
P-PHENYLENEDIAMINES (DIAMINES) UNIT

Semi-Annual Periodic Report for
March 19, 2014 through September 18, 2014

Per 40 CFR 63.152(c)(2), this Periodic Report includes all information specified in 63.117 and 63.118 for process vents, 63.122 for storage vessels, 63.129 for transfer operations, and 63.146 for process wastewater. This report covers the period from March 19, 2014 through September 18, 2014.

PROCESS VENTS

40 CFR 63.118(f):

The following Group 1 process vents are routed to the Flammable Vent Header Flare #1 (1500-34) and the Flammable Vent Header Flare #2 (1500-66): the High Boiler Column (1500-34I), the IPP Column (1500-34J), the Low Boiler Column (1500-34K), and the Refining Column (1500-34L).

(1) Daily average values outside ranges established in Notification of Compliance Status:

Not applicable. The Flammable Vent Header Flare#1, 1500-34 and the Flammable Vent Header Flare #2, 1500-66, are used to control all Group 1 process vent emissions. Per 40 CFR 63.118(a)(5), for flares, records of the time and duration of all periods during which the pilot flame is absent shall be kept rather than daily averages. The Primary Flare used is the Flammable Vent Header Flare #2 (1500-66), and the original Flammable Vent Header Flare #1 (1500-34) is used as a backup.

(2) For Group 1 points, duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data:

There were no instances of insufficient monitoring during this reporting period. See Table 1, Insufficient Monitoring Data for Process Vent Control Devices, attached.

(3) Time and duration of all periods when the vent stream is diverted from the control device through a bypass line:

Exempt: Per 40 CFR 63.114(d), equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to this paragraph. The only existing bypass lines that could divert a vent stream away from the control device are there for safety purposes and are, therefore, exempt from this requirement.

(4) Periods in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line valve was checked out:

Exempt: See (3) above.

(5) Time and duration of all periods in which the pilot flame of the Flammable Vent Header Flare #1, 1500-34, and the Flammable Vent Header Flare #2, 1500-66 were absent:

There were no outages of the Flammable Vent Header Flare #1, 1500-34, and the Flammable Vent Header Flare #2, 1500-66, during this reporting period. See attached Table 2.

(6) Carbon bed regeneration cycles:

Not applicable. Carbon beds are not used as control devices for Group 1 process vents.

40 CFR 63.118(g),(h),(i),and (j):

There were no process changes made during this report period that caused a Group 2 process vent to become a Group 1 process vent, a Group 2 process vent with a TRE greater than 4.0 to become a Group 2 process vent with a TRE less than 4.0, a Group 2 process vent with a flow rate less than 0.005 scm per minute to become a Group 2 process vent with a flow rate of 0.005 scm per minute or greater with a TRE less than or equal to 4.0, or a Group 2 process vent with an organic HAP concentration less than 50 ppm to become a Group 2 process vent with an organic HAP concentration of 50 ppm or greater with a TRE less than or equal to 4.0. See Table 3, Process Changes Affecting Process Vent Classifications, attached.

STORAGE VESSELS

40 CFR 63.122(g):

Closed vent systems and control devices are used to control emissions from Group 1 storage vessels, the Crude Storage Tank (1500-8A), the Hydrogenate Storage Tank (1500-38A), and Hydrogenate Tank No. 2 (1500-56B). The control devices used to control emissions from these storage vessels are the Crude Storage Tank Scrubber (1500-8), the Hydrogenate Storage Tank Scrubber (1500-38), and Flammable Vent Header #2 (1500-66)/Flammable Venter Header #1

(1) Planned routine maintenance operations that would require the control device to not meet the 95% efficiency emission control requirements:

A description of the planned routine maintenance on the control devices which was performed during the previous six months is presented in Table 4. Maintenance was performed on the Hydrogenate Tank Scrubber totaling 1.34 hours during the reporting period. Anticipated maintenance during the next six months is presented in attached Table 5.

(2) For control devices other than a flare, the occurrence when the monitored parameters were outside the parameter ranges documented in the Notification of Compliance Status:

There were no excursions during this reporting period. See attached Table 6.

(3) For flares, the occurrence when the control device did not meet the general control device requirements per 63.11(b):

There was no occurrence when the flare did not meet the general control device requirements. The flare is used to control emissions from 1500-56B Hydrogenate Storage Tank No. 2, a HON Group 1 storage vessel, as of June 29, 2014. (Note that Flammable Vent Header Flare #1, 1500-34 and the Flammable Vent Header Flare #2, 1500-66 are used to control emissions from a Benzene storage tank covered and reported under the Benzene NESHAP program).

TRANSFER OPERATIONS

40 CFR 63.130(d):

Periodic Report information shall be submitted for transfer racks subject to the requirements of 63.126:

Not applicable. Per 40 CFR 63.126(c), recordkeeping provisions are the only requirement for Group 2 transfer operations. All transfer operations sources are Group 2. No changes in design annual throughput, material loaded, or vapor pressure at transfer racks occurred during this reporting period.

PROCESS WASTEWATER

40 CFR 63.146(c),(d),(e),(f),(g):

Not applicable. All process wastewater sources are Group 2. No changes in average flowrate or average VOHAP concentration for wastewater streams occurred during this reporting period.

LEAK INSPECTIONS

40 CFR 63.148(k):

The closed vent systems subject to these provisions are also subject to 63.172 of subpart H; therefore, leak inspections are conducted according to requirements of 63.172.

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.118(f)(2)

TABLE 1
INSUFFICIENT MONITORING DATA FOR PROCESS VENT CONTROL DEVICES

Report Period
March 19, 2014 to September 18, 2014

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH	EQUIP. NO.	EQUIP. NAME	CAUSE OF MALFUNCTION
There was no insufficient monitoring during this reporting period.							

PER PARA 63.118(f)(5)

TABLE 2
FLAMMABLE VENT HEADER FLARE OUTAGES

Report Period
March 19, 2014 to September 18, 2014

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH (HRS)	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	COMMENTS
There were no flammable vent header flare outages during this reporting period.								

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.118(g), (h), (i), (j)

TABLE 3
PROCESS CHANGES AFFECTING PROCESS VENT CLASSIFICATIONS

Report Period
March 19, 2014 to September 18, 2014

PROCESS VENT NO.	PROCESS VENT NAME	GROUP PRIOR TO PROCESS CHANGE	DESCRIPTION OF PROCESS CHANGE	RESULTS OF RECALCULATION	CONTROL DEVICE FOR COMPLIANCE*
There were no process changes affecting any process vents' HON status made during this reporting period.					

* If process changes were made which changed the classification of a process vent, a statement that the owner or operator will comply with all applicable provisions of 40 CFR 63.113 must also be provided with this report.

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.122(g)(1)

TABLE 4
PAST MAINTENANCE FOR CONTROL DEVICES

Report Period
March 19, 2014 to September 18, 2014

MAINTENANCE PERFORMED DURING THE PAST 6 MONTHS					
EQUIP. NO.	EQUIPMENT NAME	TYPE OF MAINTENANCE PERFORMED	FREQUENCY OF MAINTENANCE	DATE PERFORMED	TIME LENGTH
1500-8	Crude Tank Scrubber	The Crude Tank was out of service for maintenance and repair. The scrubber was taken off-line on November 1, 2012 at 09:00, and returned to service July 27, 2014 at 20:45.	NA	NA	0
				Total	0 hours
1500-34	Flammable Vent Header Flare #1	No maintenance was performed on Flare #1 during this time period.	NA	NA	0
				Total	0 hours
1500-38	Hydrogenate Tank Scrubber	Repair soft water leak.	As needed	6/20/2014	1.17
1500-38	Hydrogenate Tank Scrubber	Steaming the scrubber runoff.	As needed	7/10/2013	0.17
				Total	1.34 hours
1500-66	Flammable Vent Header Flare #2	No maintenance was performed on Flare #2 during this time period.	NA	NA	0
				Total	0 hours

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.122(g)(2)

TABLE 6
MONITORED PARAMETER EXCURSIONS FOR STORAGE VESSELS

Report Period
March 19, 2014 to September 18, 2014

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH hrs:min	EQUIP. NO.	EQUIP. NAME	CAUSE OF MALFUNCTION
				There were no excursions during this reporting period.			

AI/AI/CO 11002532949 1
2804 V.12

DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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Toxics & Inspection
Coordination Branch
6EN-A

January 14, 2015

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7011 3500 0001 6350 1247

Re: DuPont – Pontchartrain Site – AI#38806
40 CFR Part 63, Subpart FFFF
Periodic Report – ACR Unit

Enclosed is the Periodic Report, as required under 40 CFR Part 63, Subpart FFFF, the MON MACT regulation, for DuPont's ACR Unit located in LaPlace, Louisiana. This Periodic Report covers the period of July 1 to December 31, 2014.

If you have any questions or comments, you can contact me at 985-536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
Senior Environmental Consultant

cc: U.S. EPA Region 6,
Air Enforcement Section
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7011 3500 0001 6350 1254

DUPONT ACR UNIT

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

TITLE V OPERATING PERMITS: 2249-V7 AND 3000-V5

40 CFR PART 63, SUBPART FFFF – PERIODIC REPORT

STARTING DATE: JULY 1, 2014

ENDING DATE: DECEMBER 31, 2014

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Ivan D. Caldwell
Responsible Official's Title	Plant Manager
Signature	Ivan D. Caldwell
Date Signed	1/9/15

Periodic Report for the ACR Unit
40 CFR Part 63, Subpart FFFF, §63.2520(e)
DuPont ACR Unit
Pontchartrain Site, LaPlace, Louisiana

40 CFR §63.2520(e)(1) Company Name and Address

DuPont
586 Highway 44
LaPlace, La. 70068
Contact – Doris B. Grego
Phone – 985-536-5437
e-mail – doris.b.grego@usa.dupont.com

40 CFR §63.2520(e)(2) Statement by Responsible Official

Included with this submittal.

40 CFR §63.2520(e)(3) Reporting Period

Reporting period beginning on July 1, 2014 and ending on December 31, 2014.

40 CFR §63.2520(e)(4) SSM Malfunctions

There were no SSM in which excess emissions occurred during this reporting period.

40 CFR §63.2520(e)(5) Deviations

No deviations from the permitted limits or permit conditions were experienced during this reporting period.

40 CFR §63.2520(e)(6) CEMS

This facility is not required to have CEMs.

40 CFR §63.2520(e)(7) Operating Scenarios

There were no new operating scenarios since the notification of compliance status was submitted.

40 CFR §63.2520(e)(8) Process Unit Groups

No new process units were added to this facility.

40 CFR §63.2520(e)(9) Other Records

Heat Exchange Systems (63.104(f)(2): This facility does not have heat exchange systems that meet this definition.

Wastewater (63.146(c), (d) and (e): This facility does not have wastewater streams which contain listed HAPs.

Equipment Leaks: If complying with Subpart H, submit the information listed in §63.182(d). If complying with Subpart UU, submit the information listed in §63.1039(b). This facility has selected to comply with Subpart H; LDAR reports are submitted separately.

Closed Vent Systems and Control Devices: This facility does not have close vent systems.

Floating Roof Tanks: This facility does not have floating roof tanks.

40 CFR §63.2520(e)(10) Notification of Process Change

There were no process changes to this facility during this reporting period that meet the requirements of this subpart.

AI/AI/CO 11002532949

DuPont Performance Polymers
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

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Toxics & Inspection
Coordination Branch
6EN-A

January 14, 2015

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, La. 70821-4312

CERTIFIED MAIL NO. 7011 3500 0001 6350 1247

Re: DuPont – Pontchartrain Site – AI#38806
Polymers and Resins Group I MACT (40 CFR Part 63, Subpart U)
Periodic Report (non-LDAR) for May 16, 2014 through November 15, 2014

Enclosed is the non-equipment leak Periodic Report under 40 CFR Part 63, Subpart U, of the Polymers & Resins Group I MACT regulation, for the DuPont Neoprene Plant located in LaPlace, Louisiana. As required by 40 CFR §63.506(e)(6)(i), this non-equipment leak Periodic Report covers the 6-month period beginning May 16, 2014 and ending on November 15, 2014.

A detailed analysis of the Periodic Report elements in 40 CFR §63.506(e)(6) is attached. Those applicable and not applicable (N/A) to the Neoprene Unit are noted.

If you have any questions or need additional information, you can contact me at (985) 536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P. E.
Senior Environmental Consultant

Enclosures

cc: U.S. EPA Region 6
Air Enforcement Section
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7011 3500 0001 6350 1254

DUPONT

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

TITLE V OPERATING PERMIT NO. 2249-V7

P&R I MACT – PERIODIC REPORT (non-LDAR)

STARTING DATE: MAY 16, 2014

ENDING DATE: NOVEMBER 15, 2014

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Ivan D. Caldwell
Responsible Official's Title	Plant Manager
Signature	Ivan D. Caldwell
Date Signed	Jan 7th, 2015

Analysis of Periodic Reporting Requirement of Polymers & Resins Group I MACT
40 CFR Part 63, Subpart U, §63.506(e)(6)
Periodic Report (non-LDAR) for DuPont
Pontchartrain Site, LaPlace, Louisiana
Reporting period beginning on May 16, 2014 and ending on November 15, 2014

40 CFR §63.506(e)(6)(i). Frequency of reporting and time period covered.

This paragraph refers to paragraphs (e)(6)(xi) and (e)(6)(xii) of §63.506 as potentially applicable exceptions to the requirement to submit semiannual Periodic Reports. Paragraph (e)(6)(xi) addresses emission points included in an emissions average. The affected Elastomer Product Process Unit (EPPU) is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in paragraph (e)(6)(xi) is not applicable (N/A).

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with these limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had no control or recovery devices for a particular emission point or process section that had excursions, as defined in §63.505(g).

The second requirement concerning quarterly reporting under paragraph (e)(6)(xii) relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(*2*). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

In the absence of a requirement to submit quarterly reports, Periodic Reports are required semiannually by paragraph (e)(6)(i). The first report was required to be submitted no later than 240 days after the date the Notification of Compliance Status was due. The Notification of Compliance Status submittal deadline was November 16, 2001. The date 240 days after the November 16, 2001 date is July 14, 2002. In addition, the first Periodic Report was required to address the six-month period beginning on the date that the Notification of Compliance Status was due. Periodic Report #1 (non-LDAR) thus covered the reporting period beginning on November 16, 2001, and ending on May 15, 2002. This Periodic Report covers the six-month reporting period, beginning on May 16, 2014 and ending on November 15, 2014.

40 CFR §63.506(e)(6)(ii). Content of Periodic Reports under certain conditions.

If during the reporting period, the affected source experienced none of the compliance exceptions or activities identified in §§63.506(e)(6)(iii) through (e)(6)(ix), then the Periodic Report is to take the short form. In this case, the Periodic Report should contain a statement that there were no compliance exceptions as specified in paragraphs (e)(6)(iii) through (e)(6)(ix) of §63.506 for the six-month period covered by the report, and that none of the activities specified in those same paragraphs occurred during the same six-month period.

40 CFR §63.506(e)(6)(iii). Content of Periodic Reports under all other conditions.

This paragraph references specific information to be provided in the Periodic Report if the conditions in the preceding paragraph (e)(6)(ii) were not met during the reporting period. The paragraph applies to affected sources subject to §63.484 through 63.501 for any emission point. This equates to affected sources subject to Subpart U and having specific applicable requirements for any combination of storage vessels, continuous front-end process vents, batch front-end process vents, back-end process vents, or process wastewater. The affected EPPU identified its specific applicable requirements in its Notification of Compliance Status submittal.

The affected EPPU notes that §63.501(a) identifies the applicable requirements for maintenance wastewater as §63.105(a). The applicable requirements for maintenance wastewater do not include any requirement to report information in the Periodic Reports required by §63.506(e)(6).

40 CFR §63.506(e)(6)(iii)(A). Cross-references to specific reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Cross-reference (40 CFR)	Required Information and Applicability
§63.122(a)(4) for storage vessels	Relates to Group 1 storage vessels (N/A)
§§63.117(a)(3), 63.118(f), and 63.485(s)(5) for continuous front-end process vents	§63.117(a)(3) relates to TRE determinations or performance tests conducted after the Notification of Compliance Status (NoCS) has been submitted. - The affected EPPU had no process changes during this reporting period that required a recalculation of the TRE index value. - The affected EPPU conducted no performance tests during this reporting period. §63.118(f)(1) relates to daily average values of monitored parameters for all operating days when daily average values recorded were outside the levels established in the NoCS or the Title V operating permit - The affected EPPU had no such days during this reporting period. §63.118(f)(2) relates to Group 1 emission points with excursions caused by insufficient monitoring data (N/A). §63.118(f)(3) relates to the times and durations of periods recorded when the vent stream is diverted from its control device through a bypass line (N/A). §63.118(f)(4) relates to periods recorded when the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line valve was checked out (N/A). §63.118(f)(5) relates to periods when all pilot flames of a flare were absent (N/A). §63.118(f)(6) relates to carbon bed regeneration cycles with recorded parameters outside the levels established in the NoCS or the Title V operating permit (N/A). §63.485(s)(5) relates to Group 1 continuous front-end process vents controlled using an internal combustion engine (N/A).
§63.492 for batch front-end process vents and aggregate batch vent streams	§63.492(a) relates to information required in the NoCS (N/A). §63.492(b) relates to process changes causing a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. §63.492(c) relates to process changes that – - cause a Group 2 batch front-end process vent with annual emissions less than 11,800 kg/year to have annual emissions greater than or equal to 11,800 kg/year but not changing the Group 2 status of the batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. - or require redetermination of the batch mass input limitation (N/A). §63.492(d) specifies process changes for which reporting is not required (N/A).

Cross-reference (40 CFR)	Required Information and Applicability
§63.492 for batch front-end process vents and aggregate batch vent streams (continued)	§63.492(e) relates to information required in the Precompliance Report for alternative control devices or alternative monitoring parameters (N/A). §63.492(f) relates to affected sources required to monitor bypass lines around control devices per §63.489(d) (N/A).
§63.499 for back-end process operations	Total amount of Neoprene manufactured between December 2013 and November 2014 = 61.4 MM pounds. HAP emissions from the back end process = 53,356 pounds. Residual Factor 0.00087
§63.104(f)(2) for heat exchange systems	Addresses reporting requirements if the delay-of-repair provisions are invoked (N/A). Note: The affected EPPU has heat exchange systems meeting the condition specified in §63.104(a)(1)—that the heat exchange systems are operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side. Accordingly, the requirements of §63.104(a)(1) do not apply to the affected EPPU.
§63.146(c) – (g) for process wastewater	§63.146(c) relates to waste management units that receive, manage, or treat Group 1 process wastewater stream(s) or residual(s) removed from Group 1 process wastewater stream(s) (N/A). §63.146(d) relates to treatment processes for Group 1 process wastewater streams and/or residuals removed from Group 1 wastewater streams (N/A). §63.146(e) relates to control devices for organic HAP emissions from Group 1 process wastewater streams (N/A). §63.146(f) relates to owners or operators who have obtained approval to use an alternative treatment process or control device or to monitor a set of alternative parameters and therefore have alternate reporting requirements (N/A). §63.146(g) relates to extensions of time to empty and remove a Group 1 process wastewater tank equipped with a floating roof from service for inspection or repairs to the floating roof per §63.133(e)(2) or for control equipment repair per §63.133(h) (N/A)

40 CFR §63.506(e)(6)(iii)(B). Reporting requirements for excursions.

This paragraph requires the owner or operator of the affected EPPU to report the daily average values or batch cycle daily average values of monitored parameters for each excursion.

Excursions are defined by paragraphs (g) and (h) of §63.505. As noted above, §63.505(h) does not apply to the affected EPPU but §63.505(g) does. In addition, for excursions caused by lack of monitoring data, the owner or operator is to specify the start time and duration of each period when monitoring data were not collected. No excursions were experienced during this reporting period.

40 CFR §63.506(e)(6)(iii)(C). [Reserved.]

40 CFR §63.506(e)(6)(iii)(D). Additional reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Citation (40 CFR §63.506)	**Required Information and Applicability**
(e)(6)(iii)(D)(*1*)	Supplements to the Emissions Averaging Plan, if any, per paragraph (e)(4)(iii) (N/A).
(e)(6)(iii)(D)(*2*)	Notification if a process change is made that changes the group status of any emission point from Group 2 to Group 1. - The affected EPPU had no such process changes during the reporting period.
(e)(6)(iii)(D)(*3*)	Notification of addition of one or more emission points or EPPUs to the affected source, with description and notification of the group status of the additional emission point or of all emission points in the EPPU. - The affected EPPU added no emission points or EPPUs during the reporting period.
(e)(6)(iii)(D)(*4*)	For EPPUs producing styrene-butadiene rubber by an emulsion process, notification of changes in standard operating procedures affecting carbon disulfide concentration in crumb dryer exhaust (N/A).
(e)(6)(iii)(D)(*5*)	Changes in the identity of the treatment facility or transferee receiving process wastewater streams for treatment pursuant to §63.132(g) (N/A).

40 CFR §63.506(e)(6)(iii)(E). Start-up, shutdown, and malfunction reports.

[Please note that the U.S. Environmental Protection Agency amended 40 CFR §63.10(d)(5)(i) and the final rule was published in the Federal Register on May 30, 2003 (68 FR 32586). This notice requires the submittal of a Shutdown and Malfunction Report with the Periodic Reports. The Neoprene Unit has procedures in place that meet the requirements of this regulation. Since this facility does not have a Group 1 source, it is our understanding, based on 40 CFR §63.506(b)(i), that a Shutdown and Malfunction Report is not required.]

This paragraph refers to the information required by paragraph (b)(1)(ii) of §63.506. In turn, §63.506(b)(1)(ii) requires semiannual start-up, shutdown and malfunction reports to be submitted on the same schedule as the non-LDAR Periodic Reports and to include the information specified in §63.10(d)(5)(i).

The affected EPPU notes, however, that paragraph (b)(1) of 40 CFR §63.506 does not require the owner or operator of an affected source to include Group 2 emission points in the written start-up, shutdown and malfunction plan unless the Group 2 emission points are included in an emissions average. Further, this paragraph limits the start-up, shutdown and malfunction plan requirement to control devices for equipment leaks and makes it optional for other equipment. The affected EPPU has no Group 1 emission points and no control devices for equipment leaks. Accordingly, the affected EPPU asserts that it is not required to develop and implement a written start-up, shutdown and malfunction plan pursuant to §63.506(b)(1).

Furthermore, §63.506(b)(1) states in its final sentence that reports related to the plan shall be submitted as specified in paragraph (b)(1)(ii) of §63.506. If the affected EPPU is not required by §63.506(b)(1) to have a written start-up, shutdown and malfunction plan, the affected EPPU asserts that it is also not required to submit reports related to that plan.

40 CFR §63.506(e)(6)(iv). Batch mass input limitation.

This paragraph requires the owner or operator to report once per year (i.e., in every other Periodic Report) the mass of HAPs or material input to the batch unit operation during the 12-month period covered by the current and previous Periodic Reports. In addition, the owner or operator must state whether the batch front-end process vent subject to the batch mass input limitation complied with the batch mass input limitation.

The affected EPPU indicated in its Notification of Compliance Status submittal that its determination of the group status of its set of batch front-end process vents was based on annualized emissions from maximum production of its single highest-HAP recipe. The result of this determination was that the affected EPPU's batch front-end process vents are Group 2. Consequently, the affected EPPU elected to comply with 40 CFR §63.487(g)(4) and §63.487(h). This compliance option does not require the affected EPPU to establish a batch mass input limitation. The affected EPPU made no recipe

changes during the reporting period that changed the identity or the composition of the single highest-HAP recipe on which this determination was based.

The election of the affected EPPU to comply with §63.487(h) for its batch front-end process vents invokes the reporting requirements of paragraphs (a)(5), (a)(6), and (b) of §63.492. The information in paragraphs (a)(5) and (a)(6) was included in the affected EPPU's Notification of Compliance Status submitted November 16, 2001, and is not required to be included in Periodic Reports.

§63.492(b) relates to process changes that cause a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. As noted in the table presented in the discussion above of reporting requirements under 40 CFR §63.506(e)(6)(iii)(A), the affected EPPU made no process changes during the reporting period that caused a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. Therefore, this Periodic Report is not required to include a notification and description of any process changes [as specified in 40 CFR §63.492(b).]

<u>40 CFR §63.506(e)(6)(v)</u>. Reporting of performance tests.

This paragraph specifies the information required for performance tests conducted during the reporting period. The affected EPPU did not conduct any performance tests during the period covered by this Periodic Report.

<u>40 CFR §63.506(e)(6)(vi)</u>. Change in primary product.

This paragraph requires notification of any change in the primary product of the affected EPPU. The affected EPPU did not change its primary product during the period covered by this Periodic Report.

<u>40 CFR §63.506(e)(6)(vii)</u>. Changes in predominant use determinations for storage tanks assigned to an affected EPPU.

The storage tanks at the affected EPPU did not require a predominant use determination. Therefore, this reporting requirement is not applicable (N/A).

<u>40 CFR §63.506(e)(6)(viii)</u>. Changes in predominant use determinations for recovery operations equipment assigned to an affected EPPU.

The recovery operations equipment at the affected EPPU did not require a predominant use determination. Therefore, this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(ix). Reduced recordkeeping program.

This paragraph requires notification of the owners or operator's election to comply with the recordkeeping provisions of §63.506(h)(1) as an alternative to the continuous operating parameter monitoring and recordkeeping provisions of Subpart U. The affected EPPU has made no such election, and therefore this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(x). Further reduced recordkeeping provisions.

This paragraph requires notification of the owner or operator's election not to retain daily average or batch cycle daily average values as a further reduction in recordkeeping for monitored parameters that would otherwise be subject to the Subpart U provisions for continuous operating parameter monitoring and recordkeeping, as provided by §63.506(h)(2). The affected EPPU notes that owners or operators wishing to avail themselves of this option must first comply with §63.506(h)(1) for at least six months with no excursions. The affected EPPU has not elected to comply with §63.506(h)(1). Accordingly, the affected EPPU is not eligible for this alternative, and this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(xi). Quarterly reporting requirements for emission points included in an emissions average.

The affected EPPU is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in this paragraph does not apply.

40 CFR §63.506(e)(6)(xii). Quarterly reporting requirements for emission points or EPPUs not included in an emissions average.

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has had more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with the limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had no excursions as defined by this section.

The second requirement under paragraph (e)(6)(xii) concerning quarterly reporting relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(*2*). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

40 CFR §63.499(f)(2) Residual Factor
[Total mass or organic HAP emitted divided by the total mass of elastomer produced.]

Applicable organic HAP emission limitation – The emission limitation for the production of neoprene shall be calculated by dividing 30 Mg/yr by the mass of neoprene produced in 2007 in Mg.

a. 2007 Neoprene Production = 73,017,000 pounds = 33,120 Mg
b. Emission Limitation = 30/33,120 = 0.00091

Month	Emissions (Pounds)	Production (Pounds)	Sum 12 months of Emissions	Sum 12 months of Production	Emiss/Prod 12 Months
Nov-13	1,385	1,685,454	56,558.00	66,179,047	0.00085
Dec-13	3,531	3,753,106	54,136.00	63,167,667	0.00086
Jan-14	3,401	4,035,624	52,114.00	60,879,528	0.00086
Feb-14	4,873	5,214,959	51,309.00	59,852,770	0.00086
Mar-14	5,020	5,958,600	49,724.00	58,684,762	0.00085
Apr-14	4,731	5,138,477	48,887.00	57,002,457	0.00086
May-14	4,752	6,091,631	48,491.00	57,004,651	0.00085
Jun-14	4,746	5,254,515	48,185.00	56,638,455	0.00085
Jul-14	5,654	6,629,590	49,077.00	57,221,259	0.00086
Aug-14	4,952	5,631,491	50,041.00	57,525,137	0.00087
Sep-14	5,035	6,128,968	50,013.00	58,352,017	0.00086
Oct-14	5,653	6,436,946	53,733.00	61,959,361	0.00087
Nov-14	1,008	1,166,445	53,356.00	61,440,352	0.00087

AI/AI/CO 1100227696 63

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6EN-A

The miracles of science™

DuPont
Pontchartrain Site
560 Highway 44
LaPlace, LA 70068-6908

February 5, 2015

CERTIFIED MAIL NO. 7011 2970 0002 5796 2181

Dept. of Environmental Quality
Office of Compliance
P. O. Box 4312
Baton Rouge, La 70821-4312

Re: DuPont Pontchartrain Site Semi-Annual Fugitive Emissions Consolidated Source Agreement Periodic Report (LDEQ Agency Interest Numbers 1101 & 38806)

As required in accordance with the Fugitive Emissions Consolidated Source Agreement dated November 18, 2013, and Letter of Response dated December 20, 2013, enclosed is the Periodic Report for the DuPont Pontchartrain Site located in LaPlace, Louisiana. This Periodic Report includes the reporting requirements for the semi-annual (second half of 2014) period of July 1, 2014 through December 31, 2014.

According to the Fugitive Emissions Consolidated Source Agreement, which was effective January 1, 2014, the entire DuPont Pontchartrain Site will comply with the HON (40 CFR Subpart H) as the most stringent and guiding fugitive rule. The reporting requirements were also consolidated with this Agreement and the Fugitive Emissions Consolidated Source Agreement Periodic Report as enclosed is being submitted in accordance with 40 CFR Subpart H (40 CFR 63.182.d). The Fugitive Emissions Consolidated Source Agreement Periodic Report will be the only fugitive periodic report submitted since it fulfills all other fugitive program reporting requirements. Previously, the facility submitted multiple periodic reports for differing time periods for each process unit according to various applicable reporting requirements. Previous reports included Subpart H-HON, Subpart FFFF, Subpart U-P & R I, and LAC 33:III.2121 periodic reports for the ACR, Chloroprene, Neoprene, Diamines, and HCL Recovery Units if applicable to those rules. Also to note, since HON Subpart H is now the governing rule for all of the components on-site, the data within the Periodic Report has been consolidated and summarized. In other words, process unit data is not listed independently, but is listed as part of the DuPont Pontchartrain Site's data within the Periodic Report.

If you have any questions or need any additional information, please contact me at (985) 536-5438 or at Anthony.J.Fugarino@dupont.com.

Sincerely,

Anthony Fugarino

Anthony Fugarino
DuPont SHE Consultant

Enclosures

cc: CERTIFIED MAIL NO. 7011 2970 0002 5796 2198
US EPA Region 6
Routine Air Compliance Report Submission
Compliance and Enforcement Division
Mail Number: 6EN-AA
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

FUGITIVE EMISSIONS CONSOLIDATED SOURCE AGREEMENT PERIODIC REPORT
DuPont Pontchartrain Site
July 1, 2014 through December 31, 2014

1. NAME OF FACILITY: DuPont Pontchartrain Site

PROCESS UNITS: All on-site units (Chloroprene, ACR, Neoprene, HCL Recovery, and Diamines Manufacturing Units) per Fugitive Emissions Consolidated Source Agreement

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2014 THIRD QUARTER	2014 FOURTH QUARTER
(i)	No. valves found leaking	1	0
	Percent valves leaking	0.02	0
	Total no. monitored	4107	3899
(ii)	No. leaking valves not repaired	0	0
	No. valves not Repairable	0	0

		2014 JUL	AUG	SEP	OCT	NOV	DEC
(iii)	No. pumps leaking §63.163 (P_L)	0	0	0	0	0	0
	Total no. pumps leaking §63.182(d)(2)(iii)	0	0	0	1	1	0
	Percent leaking pumps (%P_L) (Includes "P_L" leaks only)	0	0	0	0	0	0
	Total no. monitored	136	144	144	123	66	135
(iv)	No. leaking pumps not repaired	0	0	0	0	0	0
(v)	No. compressors found leaking	0	0	0	0	0	0
(vi)	No. leaking compressors No repaired	0	0	0	0	0	0
(vii)	No. agitators found leaking	0	0	0	0	0	0
(viii)	No. leaking agitators not repaired	0	0	0	0	0	0

FUGITIVE EMISSIONS CONSOLIDATED SOURCE AGREEMENT PERIODIC REPORT
DuPont Pontchartrain Site
July 1, 2014 through December 31, 2014

2. SUMMARY INFORMATION (cont.)
[40 CFR §63.182 (d)(2)]

		2014	
		THIRD QUARTER	FOURTH QUARTER
(ix)	No. leaking connectors	2	0
	Percent connectors leaking	0.015	0
	Total no. monitored	13,510	94
(x)	Reserved		
(xi)	No. leaking connectors not repaired	0	0
	No. connectors not repairable	0	0

(xii) Reserved

(xiii) Explain delay of repairs, if any, and why process unit shutdown was technically infeasible, if appropriate. The table below summarizes all components that were found leaking and had their repair delayed during this reporting period. Components that cannot be repaired without a process unit shutdown will be repaired during the next process unit shutdown. "Shutdown – delay of repair" components were delayed because we were not able to bypass or isolate them for repair. A process unit shutdown is required to repair these components in a safe, responsible manner. Components that have been isolated will be repaired before returning to service.

Unit	Chemical State	ID/Tag Number	Type of Component	Delay of Repair Reason
Diamines	Light Liquid	50811016	Pump	Isolated & not in HAP Service
Diamines	Light Liquid	50811017	Pump	Isolated & not in HAP Service
Diamines	Heavy Liquid	50809467	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50809494	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50812071	Connector	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50810993	Pump	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50808296	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50809503	Connector	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50806062	Connector	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	1522150109	Pump	Isolated & not in HAP Service

All components summarized in the table above were discovered leaking through sensory methods.

2. SUMMARY INFORMATION (cont.)
[40 CFR §63.182 (d)(2)]

(xiv) Results of monitoring to comply with:

63.164 (i) – The Pontchartrain Site monitors compressors monthly instead of annually. Compressor monitoring results are summarized above in sections v and vi of this periodic report. No compressors were found leaking during this period as a result of this monitoring.

63.165 (a) – Gas/vapor service pressure relief devices are monitored once a month to insure they operate below the 500 ppm limit. No gas/vapor service pressure relief devices were found leaking during this period as a result of this monitoring.

63.172 (f) – Annual Closed Vent Visual Inspections were conducted in the fourth quarter of 2014, this semi-annual reporting period. No leaks were found during these visual inspections.

(xv) Not applicable

(xvi) Connectors Monitoring Alternatives – Since the implementation of the fugitive emission program the Pontchartrain Site has used the monitoring alternative described under 63.174(c)(1)(ii).

(xvii) Not applicable

3. CONSOLIDATED SOURCE AGREEMENT REQUIREMENT

Summary of all monitoring performed within the Reporting Period at the Pontchartrain Site

Equipment Category	Number of Components Monitored
Connector	13,604
Valve	8,006
Pump	748
Compressor	6
Instrumentation system	41
Agitator	134
Pressure relief device	442

DuPont Protection Technologies
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068

Certified Mail: 7006 2150 0003 4644 3593

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

March 19, 2015

Re: Annual Title V Certification for LA Permit Number 896-V3, DuPont Power Unit
LA Agency Interest Number: 1101

As required under 40 CFR 70.6(c)(5)(iv), E.I. DuPont de Nemours and Company, Inc. is submitting the annual certification for the Power unit located in LaPlace, Louisiana. It covers from January 1, 2014 through December 31, 2014.

If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
Environmental Coordinator

Enclosures

cc: LDEQ Office of Environmental Compliance, P.O. Box 4312, Baton Rouge, LA 70821-4312
Southeast Regional Office; 201 Evans Road, Suite 420, New Orleans, LA 70123-5230

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 1)

Applicable Reporting Period: 01/01/14 (mm/dd/yy) to 12/31/14 (mm/dd/yy)

Company and Facility Identification					
Permit Number	896-V3	Parish	St. John the Baptist	Date Permit Issued	31.Oct.2013
Company Name	E. I. DuPont de Nemours and Company, Inc				
Facility Name	Pontchartrain Site			Agency Interest Number	1101
Mailing Address	586 Highway 44				
City	LaPlace	State	LA	Zip Code	70068-6912
Contact Person	Toni L. Martin	Phone #	985-536-5241	Fax #	985-536-5675
Principal Facility Product/Business	Plant Services including Steam and Firewater				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	Ivan Caldwell	Date	March 19, 2015
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 2)

Title V Permit Number: 896-V3 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Power Unit at Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier [A]	Permit Condition Number [B]	Applicable Compliance Requirement (Include Rule Citation) [C]	Method(s) or Other Means For Determining Compliance Status [D]	Permit Required Monitoring Frequency [E]	Compliance Status - See Guidance for Certification Part 2 [F]
EQT095 (1-90) Gasoline Stor Tnk	1 - 2	Equipped with submerged fill pipe [LAC 33:III.2103.A, LAC 33:III.5109.A]	Tank design documents	none stated	Continuous

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting		
Title V Permit Number: 896-V3 **Company Name:** E. I. DuPont de Nemours and Company, Inc		
Facility Name: Power Unit at Pontchartrain Site **AI Number:** 1101		
Question	**Response (Yes/No)**	**If the deviations have been previously reported, please reference below the report and date of the report.**
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	**Yes**	1st H 2014 Dev Rep sent to LDEQ 7006 2150 0003 4644 3692 (BR) 7006 2150 0003 4644 3708 (NO)

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must minimally contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4)

Deviation Summary Report

Title V Permit Number: 896-V3 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Power Unit at Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier	Pollutant	Permit Condition Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT095 (1-90) Gasoline Stor Tnk	BTEX n-hexane	1 - 2	Equipped with submerged fill pipe [LAC 33:III.2103.A, LAC 33:III.5109.A]	Tank design documents	none stated

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4 continued)

Deviation Summary Report

Title V Permit Number: 896-V3 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Power Unit at Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
NA	7/14/13	NA	2/11/14	NA	NA	A diesel air compressor was brought onto the site on July 14, 2012 to provide emergency relief for the electric air compressor during times of maintenance. The diesel air compressor remained connected until February 11, 2014. The diesel air compressor operated 180.1 hours during the eighty-two weeks on site where is operated as the emergency back-up for the electric air compressor, and also for the maintenance purposes for itself. The calculated emissions for the emergency diesel air compressor are 1.32 tons NOx, 0.284tons CO, 0.087tons SOx, and 0.093tons PM. According to 40 CFR 63.6645(e), an Initial Notification is required not later than 120 days after becoming subject to this subpart. DuPont failed to make the proper notification once the emergency diesel air compressor became a permanent engine July 14, 2013. The diesel air compressor was not intended to become a permanent engine at the site, and therefore was removed, once the oversight had been discovered. All of the maintenance required for an emergency engine (oil changes, air filter, belt & hose inspections) was completed during the entire time on site.	The emergency diesel air compressor was removed from site, and has been replaced with an electric air compressor. The site procedure has been updated to include better guidance for temporary and permanent engines, and site wide training will be conducted by the end of the year.
						No Deviations in 2Q14	
						No Deviations in 3Q14	
						No Deviations in 4Q14	

PERMIT NO: 896-V3 Annual Compliance Certification

Applicable Reporting Period: January 1, 2014 to December 31, 2014

Specific Reqmnt	Citation	Emission Point	Requirement	Status	Compliant
1	LAC 33:III. 2103.A	EQT095 Gasoline Tnk	Equip with a submerged fill pipe.	Equip Design Records	Yes
2	LAC 33:III. 2107	EQT095 Gasoline Tnk	Control Air Toxics to MACT= Equipped w submerged fill pipe	Equip Design Records	Yes
6 20 34 66 96 110	NESHAP ZZZZ 40 CFR 63 63.6602	EQT101 Diesel Gen EQT104 #2 Fire P Stack EQT106 #4 Fire P Stack EQT110 #5 Fire P Stack	Limit time spent at idle, and minimize startup time	Procedure	Yes
4 64 5 65 18 94 19 95 32 108 33 109	NESHAP ZZZZ 40 CFR 63 63.6602	EQT101 Diesel Gen EQT104 #2 Fire P Stack EQT106 #4 Fire P Stack EQT110 #5 Fire P Stack	Visual Inspection annually Inspect all hoses and belts. Inspect air cleaner.	Procedure	Yes
3 17 31 63 93 107	NESHAP ZZZZ 40 CFR 63 63.6602	EQT101 Diesel Gen EQT104 #2 Fire P Stack EQT106 #4 Fire P Stack EQT110 #5 Fire P Stack	Change oil & filter annually	Procedure	Yes
7 67 8 68 21 97 22 98 35 111 36 112	NESHAP ZZZZ 40 CFR 63 63.6605(a) 63.6605(b)	EQT101 Diesel Gen EQT104 #2 Fire P Stack EQT106 #4 Fire P Stack EQT110 #5 Fire P Stack	Comply with the emission and operating limitations. Operate at all times to minimize emissions.	Procedure	Yes
9 69 10 70 23 99 24 100 37 113 38 114	NESHAP ZZZZ 40 CFR 63 63.6625(e) 63.6625(f)	EQT101 Diesel Gen EQT104 #2 Fire P Stack EQT106 #4 Fire P Stack EQT110 #5 Fire P Stack	Operate and maintain according to [manufacturer's] maintenance plan. Install non-resettable hour meter.	Procedure	Yes
11 71 12 72 13 73 25 101 26 102 27 103 39 115 40 116 41 117	NESHAP ZZZZ 40 CFR 63 63.6640(a) 63.6640(f)(1)(ii) 63.6640(f)(1)(iii)	EQT101 Diesel Gen EQT104 #2 Fire P Stack EQT106 #4 Fire P Stack EQT110 #5 Fire P Stack	Demonstrate compliance with the emission and operating limitations in Table 2c, Limit maintenance checks and readiness checks to 100hr/yr. Operate <50 hours in non-emergency situations	Procedure	Yes

PERMIT NO: 896-V3 Annual Compliance Certification
Applicable Reporting Period: January 1, 2014 to December 31, 2014

Specific Reqmnt	Citation	Emission Point	Requirement	Status	Compliant
14 28 42 74 104 118	NESHAP ZZZZ 40 CFR 63 63.6655	EQT101 Diesel Gen EQT104 #2 Fire P Stack EQT106 #4 Fire P Stack EQT110 #5 Fire P Stack	Equipment / Operational recordkeeping according to (a) through (f), as applicable.	Procedure	Yes
15 77 16 78 29 91 30 92 43 105 44 106 75 119 76 120	LAC 33:III. 1101.B LAC33:III. 1311.C	EQT101 Diesel Gen EQT104 #2 Fire P Stack EQT106 #4 Fire P Stack EQT110 #5 Fire P Stack EQT112 #6 Fire P Stack	Opacity > 20 percent for not more than one 6 minute period in any 60 consecutive minutes, otherwise <= 20 percent	controlled by maintenance and use of low sulfur diesel fuel	Yes
79	40 CFR 60.4205(b)	EQT118 8000 Bldg Gen	Comply with emission req for new nonroad CI engines.		Yes
80	40 CFR 60.4206	EQT118 8000 Bldg Gen	Comply with the applicable emission standards.	Procedure	Yes
81	40 CFR 60.4207(b)	EQT118 8000 Bldg Gen	Purchase diesel fuel that complies with 40 CFR 80.510(b).	Procedure	Yes
82	40 CFR 60.4209(a)	EQT118 8000 Bldg Gen	Install non-resettable hour meter.	Procedure.	Yes
83 84 85	40 CFR 60.4211(a)(1) 60.4211(a)(2) 60.4211(a)(3)	EQT118 8000 Bldg Gen	Operate and maintain according to [manufacturer's] maintenance plan. Change only those emission related settings that are permitted by the manufacturer, Meet reqs of 40 CFR 89, 94 and/or 1068.	Procedure.	Yes
86	40 CFR 60.4211(c)	EQT118 8000 Bldg Gen	Ensure engine is certified to emissions standards.	Manufacturer's certification is on file.	Yes
87	40 CFR 60.4211(f)	EQT118 8000 Bldg Gen	Limit maintenance checks and readiness checks to 100hr/yr. Operate <50 hours in non-emergency situations.	Procedure.	Yes
88	40 CFR 60.4211(g)(2)	EQT118 8000 Bldg Gen	Equipment / Operational recordkeeping, as applicable.	Procedure.	Yes
89	40 CFR 60.4214(b)	EQT118 8000 Bldg Gen	Operating time recordkeeping.	Procedure.	Yes
90	40 CFR 63.6590(c)	EQT118 8000 Bldg Gen	Meet requirements of 40 CFR 60 Subpart IIII.	Procedure.	Yes
45 54	NESHAP DDDDD 40 CFR 63 63.7495	EQT108 #1 Boiler EQT109 #2 Boiler	Comply with all applicable requirements of DDDDD by January 31, 2016.	Comply with all applicable requirements of DDDDD by January 31, 2016.	

PERMIT NO: 896-V3 Annual Compliance Certification

Applicable Reporting Period: January 1, 2014 to December 31, 2014

Specific Reqmnt	Citation	Emission Point	Requirement	Status	Compliant
136	LAC 33:III. 535	GRP011 Power Area	Comply with the Part 70 General conditions	procedures	Yes
137 138 139 140	LAC 33:III. 5609.A.1.b 5609.A.2.b 5609.A.3.b	GRP011 Facility	Preplanned abatement strategy when alert, warning, emerg	procedures	Yes
141	LAC 33:III. 5901.A	GRP011 Power Area	Comply with 40 CFR 68 Hazard Assessment	procedures	Yes
142	LAC 33:III. 5907	GRP011 Power Area	Identify hazards that may result from accidental releases	Procedure	Yes
143 144	LAC 33:III. 5911.A 5911.C	GRP011 Facility	Risk Management registration submit amended reg if change	procedures	Yes
145	LAC 33:III. 919	GRP011 Facility	Submit ERIC by 30 April for preceding year.	procedures	Yes
146	LAC 33:III. 927	GRP011 Power Area	Report unauthorized discharge of any air pollutant	procedures	Yes
122 123 124	NESHAP FF 40 CFR 61 61.342 61.355(c) 61.357(a)	GRP011 Facility	Submit initial report. Maintain records for each waste stream containing Benzene subject to this subpart	The initial report was submitted in 1993. The records are maintained onsite.	Yes

AI/AI/CO 1100005971 31

LA 804 V.1

DuPont Protection Technologies
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068

RECEIVE
MAR 30 2015
Air/Toxics & Inspection
Coordination Branch
6EN-A

Certified Mail: 7006 2150 0003 4644 3593

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

March 19, 2015

Re: Annual Title V Certification for LA Permit Number 2090-V6
LA Agency Interest Number: 1101

As required under 40 CFR 70.6(c)(5)(iv), E.I. DuPont de Nemours and Company, Inc. is submitting the annual certification for the Diamines unit located in LaPlace, Louisiana for the period of January 1, 2014 through December 31, 2014.

If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
Environmental Coordinator

Enclosures

cc: LDEQ Office of Environmental Compliance, P.O. Box 4312, Baton Rouge, LA 70821-4312
LDEQ Southeast Regional Office, 201 Evans Road, Suite 420, New Orleans, LA 70123-5230

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 1)

Applicable Reporting Period: 01/01/14 (mm/dd/yy) to 12/31/14 (mm/dd/yy)

Company and Facility Identification					
Permit Number	2090-V6	Parish	St. John the Baptist	Date Permit Issued	14.Mar.2013
Company Name	E. I. DuPont de Nemours and Company, Inc				
Facility Name	Pontchartrain Site			Agency Interest Number	1101
Mailing Address	586 Highway 44				
City	LaPlace	State	LA	Zip Code	70068-6912
Contact Person	Toni L. Martin	Phone #	985-536-5241	Fax #	985-536-5675
Principal Facility Product/Business	p-phenylenediamine				

Certification of Truth, Accuracy, and Completeness			
I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.			
Responsible Official (signature)			
Responsible Official (typed)	Ivan Caldwell	Date	March 19, 20[illegible]
Responsible Official Title	Plant Manager		

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 2)

Title V Permit Number: 2090-V6 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier [A]	Permit Cond Number [B]	Applicable Compliance Requirement (Include Rule Citation) [C]	Method(s) or Other Means For Determining Compliance Status [D]	Permit Required Monitoring Frequency [E]	Compliance Status - See Guidance for Certification Part 2 [F]
EQT0012 1500-8 Crude Tank Scrubber	27	Scrub to reduce HAP emissions 95% [LAC 33:III.501.C.6]	Monitor and record the water scrubber flow rate. Minimum flow rate is 400 pph.	Every 15 minutes	Continuous.
EQT0015 1500-11 Product Storage Tank Scrubber	47	Flow rate >= 450 pph [LAC 33:III.501.C.6]	Continuous monitoring by data acquisition system. Manual readings taken by operators if there is an outage of the data acquisition system.	Every 12 hours (1/shift)	Continuous.
EQT0024 1500-17/18 Tank Scrubber	74	Flow rate >= 0.5 gpm [LAC 33:III.501.C.6]	Record flow rate once every 12 hours (1/shift)	Every 12 hours (1/shift)	Continuous.
EQT0030-31 1500-66 & 34 FVH Flare	98 & 118	Reduce Benzene emissions 95% [40CFR61.271(c)(2)]	Presence of a flame	Every 1 hour	Continuous.
EQT0051 1500-38 Hydrogenate Tank Scrubber	213	Scrub to reduce HAP emissions 95% [LAC 33:III.501.C.6]	Monitor and record the water scrubber flow rate. Minimum flow rate is 250 pph.	Every 15 minutes	Intermittent – due to water flow on November 1.
EQT0055 1500-45 Product Loading Scrubber	224	Flow rate >= 400 pph [LAC 33:III.501.C.6]	Record flow rate once every 12 hours (1/shift) when rack in service	Every 12 hours (1/shift)	Continuous.
EQT075 (1500-56C) BDU Tk Scrubber	2 - 5	Record water flow rate to the scrubber [LAC 33:III.501.C.6, LAC 33:III.2115.K]	Field reading sheet value	Once per shift	Continuous.
EQT0063 1500-60 Synthesis Flare	262	Reduce TAP emissions 98% [LAC 33:III.5109.A]	Presence of a flame	Every 1 hour	Continuous.

Title V Permit Number: 2090-V6 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier [A]	Permit Cond Number [B]	Applicable Compliance Requirement (Include Rule Citation) [C]	Method(s) or Other Means For Determining Compliance Status [D]	Permit Required Monitoring Frequency [E]	Compliance Status - See Guidance for Certification Part 2 [F]
EQT0072 1500-65 Truck Loading Scrubber / Off-Quality Scrubber	296	Flow rate >= 450 pph [LAC 33:III.501.C.6]	Record flow rate once every 12 hours (1/shift)	Every 12 hours (1/shift)	Continuous.

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 3)

Deviation Reporting		
Title V Permit Number: 2090-V6 **Company Name:** E. I. DuPont de Nemours and Company, Inc		
Facility Name: Diamines Unit at Pontchartrain Site **AI Number:** 1101		
Question	**Response (Yes/No)**	**If the deviations have been previously reported, please reference below the report and date of the report.**
Are there any instances of deviation from permit requirements being reported with this annual compliance certification? If yes, and they have not been previously reported, then complete the table entitled "Deviation Summary Report" (Certification Part 4).	Yes.	2nd H 2014 Dev Rep sent to LDEQ 7006 2150 0003 4644 8574 (BR) 7006 2150 0003 4644 3586 (NO)

* As with all Title V air permit application forms and compliance certifications, deviation reports must contain certification by a responsible official of truth, accuracy, and completeness. Also, any previous deviation reports must minimally contain the information necessary to complete the "Deviation Summary Report" present as (Certification Part 4) in this annual compliance certification form. Therefore, if these two conditions are not satisfied, then the deviations inappropriately reported before must be appropriately reported in (Certification Part 4).

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4)

Deviation Summary Report

Title V Permit Number: 2090-V6 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier	Pollutant	Permit cond Number	Applicable Compliance Requirement (Include Rule Citation)	Method(s) or Other Means For Determining Compliance Status	Permit Required Monitoring Frequency
EQT0012 1500-8 Crude Tank Scrubber	Aniline OPDA PPDA	23	Scrub to reduce HAP emissions 95% [LAC 33:III.501.C.6]	Monitor and record the water scrubber flow rate. Minimum flow rate is 400 pph.	Every 15 minutes
EQT0015 1500-11 Product Storage Tank Scrubber	OPDA PPDA	40, 41	Flowrate >= 450 pph [LAC 33:III.501.C.6]	Monitor and record the water scrubber flow rate.	Every 12 hours (1/shift)
EQT0024 1500-17/18 Tank Scrubber	Ammonia Aniline Benzene	65, 66	Flowrate >= 0.5 gpm [LAC 33:III.501.C.6]	Monitor and record the water scrubber flow rate.	Every 12 hours (1/shift)
EQT0030-31 1500-66 & 34 FVH Flare	Ammonia Aniline Benzene OPDA, PPDA	90 & 109	Reduce Benzene emissions 95% [40CFR61.271(c)(2)]	Presence of a flame	Every 1 hour
EQT0051 1500-38 Hydrogenate Tank Scrubber	Ammonia Aniline Benzene OPDA, PPDA	181	Scrub to reduce HAP emissions 95% [LAC 33:III.501.C.6]	Monitor and record the water scrubber flow rate. Minimum flow rate is 250 pph.	Every 15 minutes
EQT0055 1500-45 Product Loading Scrubber	Ammonia Benzene OPDA, PPDA	189, 190	Flowrate >= 400 pph [LAC 33:III.501.C.6]	Monitor and record the water scrubber flow rate when rack in service	Every 12 hours (1/shift)
EQT075 (1500-56C) BDU Tk Scrubber	2 - 5	253, 254	Field reading sheet value	Monitor and record the water scrubber flow rate.	Once per shift
EQT0063 1500-60 Synthesis Flare	Ammonia Aniline Benzene	215	Reduce TAP emissions 98% [LAC 33:III.5109.A]	Presence of a flame	Every 1 hour
EQT0072 1500-65 Truck Loading Scrubber / Off-Quality Scrubber	OPDA PPDA	248, 249	Flowrate >= 450 pph [LAC 33:III.501.C.6]	Monitor and record the water scrubber flow rate.	Every 12 hours (1/shift)

Louisiana DEQ Title V Annual Compliance Certification Form

(Certification Part 4 continued)

Deviation Summary Report

Title V Permit Number: 2090-V6 **Company Name:** E. I. DuPont de Nemours and Company, Inc

Facility Name: Pontchartrain Site **AI Number:** 1101

Emission Source No./ Identifier	Deviation Began		Deviation Ended		Total No. of Hours	Cause(s) of Deviation	Corrective Action(s) Taken
	Date	Time	Date	Time			
EQT0051 1500-38 Hydrogenate Tank Scrubber	11/1/2014	07:21	11/2/2014	07:20	24	Loss of soft water to the scrubber caused mechanical difficulties. No. 1 Hydrogenate Tank level at less than 5%.	Repaired and restored water flow to the scrubber.

PERMIT NO: 2090-V6 Annual Compliance Certification
Applicable Reporting Period: January 1, 2014 to December 31, 2014

Requirement Number	Citation	Emission Points	Requirement	Compliance Status	Compliance
1	LAC 33:III.919	Facility	Submit EIS Report by March 31st of each year for the period of January 1st to December 31st of previous calendar year	The 2006 EIS Report was mailed by March 31st, 2007	Yes
2	LAC 33:III.927	Facility	The unauthorized discharge of any air pollutant into the atmosphere shall be reported in accordance with LAC 33:I. Chapter 39	Procedures and training are in place for the reporting as per the regulation.	Yes
3	LAC 33.III.5107	Facility	Submit a TEDI report by July 1st of each year for the preceding calendar year.	The 2013 ERIC report was completed on Apr 29, 2014	Yes
4	40 CFR 68 and LAC 33:III. Chapter 59	Facility	Submit a Risk Management Plan by the specified Date	An updated Risk Management plan was submitted on August 13, 2014	Yes
5	NESHAP FF 40 CFR 61.356 and 61.357	Facility	Submit initial report. Maintain records for each waste stream subject to this subpart	The initial report was submitted in 1993. The records are maintained onsite.	Yes
6	40 CFR 63.151 and 152	Facility	Comply with the applicable MRR requirements in 40 CFR 63.151(b), 152(a), (b), and (c)	The initial letter for applicability was sent in 1994, and the Diamines unit is subject to SOCMI Subpart G and SOCMI Subpart H and conducting MRR as required	Yes
7	NSPS Kb for Vol Stg Vessels 40 CFR 60.110b	1150-24 1500-54B 1500-9	Keep accessible records showing the dimensions and capacity of the storage vessels for the life of the source as specified in 60.116b (a) and (b)	Records showing the dimensions and capacity are maintained onsite	Yes
8	NESHAP (HON) G Wastewater	1150-24 1500-20A 1500-22 1500-34B 1500-34T 1500-51 1500-52 1500-63 1500-64	Recordkeeping and reporting as specified in 40 CFR 63.146 and 147	This is a Group 2 wastewater stream. Required records are maintained on site, and the periodic reports are submitted to the agencies.	Yes

PERMIT NO: 2090-V6 Annual Compliance Certification
Applicable Reporting Period: January 1, 2014 to December 31, 2014

Requirement Number	Citation	Emission Point	Requirement	Status	Compliance
9	NESHAP (HON) G Process Vents 40 CFR 63.113 (e)	1500-34H 1500-34M 1500-3A 1500-60E	TRE Calculation per 61.115 and the applicable reporting and recordkeeping per 63.117 and 63.118	These are Group 2 vents with TRE > 4. The records are maintained on site, and the periodic reports are submitted to the agencies.	Yes
10	NESHAP (HON) G 40 CFR 63.119(a)(1), 119(e), 120(d)	1500-38A 1500-8A	a) Storage Vessels should be equipped with a CVS and a control device. Annual inspections of the CVS system. b) Monitoring of the Scrubber flow as per the regulations c) Recordkeeping per 40 CFR 63.123 (a) showing the dimensions and capacity analysis of the storage vessels. d) Reporting per 40 CFR 63.122(a),(b),(c) and (g).	Records are maintained onsite, and the periodic reports are submitted to the agencies.	Yes, with the exception on 11/1.
11	NESHAP (HON) G Storage Vessels 40 CFR 63.119(a)(3)	1500-11A 1500-11B 1500-11C 1500-11D 1500-11E 1500-17 1500-18 1500-34A 1500-34C 1500-34D 1500-34E 1500-8A 1500-9	Recordkeeping per 40 CFR 123(a) showing dimensions and capacity of the storage vessel	Records are maintained on site.	Yes
12	NESHAP (HON) G Transfer Operation 40 CFR 63.126(c)	1500-11F 1500-45A	Recordkeeping showing design and actual annual throughput of the transfer rack, weight percent of the organic HAPs.	Records are maintained on site.	Yes
13	NESHAP Y Benzene Storage Vessel 40 CFR 61.271(c)(2)	1500-34 1500-66	Flare shall comply with the general control device requirements of 40 CFR 60.18 of Subpart A Submit a semi-annual report of each occurrence that results in excess emissions	Records are maintained on site, and reports are submitted to the agencies.	Yes

PERMIT NO: 2090-V6 Annual Compliance Certification
Applicable Reporting Period: January 1, 2014 to December 31, 2014

Requirement Number	Citation	Emission Point	Requirement	Status	Compliance
14	NESHAP Y Benzene Storage Vessels 40 CFR 61.271(c)	1500-34C	Submit Initial Report Recordkeeping to include dimensions and capacity of storage vessel	Initial report submitted. Records are maintained on site.	Yes
15	NESHAP BB Benzene Transfer 40 CFR 61.300(d)	1500-34S	Recordkeeping to include a) Facility name and address b) Weight percent of Benzene Loaded c) Type of vessel used d) Annual amount of Benzene loaded	Records are maintained on site.	Yes
16	NESHAP Subpart V 40 CFR 61.240	1500-58	MRR per overall most stringent program in LA.	The Diamines Unit is subject to SOCMI HON Subpart H which is the most stringent fugitive monitoring program and is conducting MRR as required.	Yes
17	LAC 33:III.1105	1500-12 1500-2 1500-34 1500-60 1500-66	Notify administrative authority as soon as possible if emergency events cannot be controlled in six hours	Procedures and training exists to alert the authorities in the event of an opacity exceedence	Yes
18	LAC 33:III.1513	1500-12 1500-2 1500-34 1500-60 1500-66	Record and retain data to demonstrate compliance or exemption from LAC 33:III.1503	Exemptions from LAC 33:III.1503 are documented	Yes
19	LAC 33:III.2103	1500-34C 1500-60A 1500-60B	Recordkeeping per LAC 33:III.2103 I: a) Date and reason for any maintenance or repair of control device b) Estimated quantity and duration of VOC Emissions during such an activity	Records are maintained on site	Yes
20	LAC 33:III.2107	1500-34S	Keep a daily record of the total throughput of VOC loaded at the facility as specified in LAC 33:III.2107.D.1	Records are maintained on site	Yes

PERMIT NO: 2090-V6 Annual Compliance Certification
Applicable Reporting Period: January 1, 2014 to December 31, 2014

Requirement Number	Citation	Emission Point	Requirement	Status	Compliance
21	LAC 33.III.2115	1500-11 1500-65 1500-17/18 1500-20 1500-3 1500-34H 1500-34M 1500-34S 1500-38 1500-45 1500-60E 1500-8	Records to demonstrate that VOC emissions are less than 100 lbs in any 24 hour continuous period as specified in LAC 33.III.2115.K.4	Records are maintained on site	Yes
40 249	LAC 33:III.H.1.a	1500-11 1500-65	Flow rate monitored by flow rate monitoring device once every twelve hours.	Records are maintained on site.	Yes
92	40 CFR 63.116(a)(2)	1500-66	Determine the net heating value of the gas being combusted using the techniques specified in 40 CFR 63.11(b)(6).	Records are maintained on site.	Yes

AI/AI/CO 110000597131
LA. 804 V.12

DuPont Protection Technologies
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068

RECEIVE

MAY 18 2015

Air Toxics & Inspection
Coordination Branc
6EN-A

Certified Mail No. 7013 1710 0001 8676 7070

Routine Compliance Report Submission
6EN-AA, Air Enforcement Section
EPA Region 6 Compliance & Enforcement Div
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

May 15, 2015

RE: SOCMI HON Subpart G Periodic Report
Period: Sep 19, 2014 - Mar 18, 2015
Facility: DuPont DPT in LaPlace, LA
Agency Interest # 1101

Enclosed is the SOCMI Hon Subpart G Periodic Report for DuPont's P-phenylenediamine (Diamines) Unit located in LaPlace, Louisiana. This report is required per 40 CFR 63.152 (c) and covers the compliance period of September 19, 2014 to March 18, 2015. This Periodic Report also includes a signed Startup, Shutdown, and Malfunction Certification as required per 40 CFR 63.10(d)(5)(i) of Subpart A.

A copy of this report is also being sent to LDEQ. If you have any questions or need any additional information, please contact me at (985) 536-5241.

Sincerely,

Toni L. Martin
Environmental Coordinator

Enclosures:

cc: Routine Compliance Report Submission
LDEQ Office of Environmental Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

E. I. DU PONT DE NEMOURS & COMPANY, INC.
PONTCHARTRAIN SITE
LA PLACE, LOUISIANA
P-PHENYLENEDIAMINES (DIAMINES) UNIT

COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
PERIODIC STARTUP, SHUTDOWN, MALFUNCTION
AND CERTIFICATION REPORT PER PARA 63.10(d)(5)(i)

Semi-Annual Periodic Certification for
September 19, 2014 through March 18, 2015

All actions taken by E. I. DuPont de Nemours & Co., Inc., located at the Pontchartrain Site, during startup, shutdown, or malfunction of any process or air pollution control device equipment were consistent with the procedures detailed in the Startup, Shutdown, and Malfunction Plan. This plan was compiled as required per 40 CFR 63.6(e)(3) for the Diamines Unit which produces p-phenylenediamine and is therefore subject to applicable requirements of SOCMI HON regulations. During the reporting of September 19, 2013 to March 18, 2014, all process equipment and air pollution control device equipment was operated in a manner consistent with good air pollution control practices for minimizing emissions to the levels required by all relevant SOCMI HON standards.

I certify that the procedures described in the Startup, Shutdown, and Malfunction Plan were followed:

Signature: _____ Date: May 14, 2015
Ivan Caldwell, Plant Manager

(If the procedures described in the Startup, Shutdown, and Malfunction Plan were not followed, prepare and attach a Startup, Shutdown, and Malfunction Plan Variance Report.)

E. I. DU PONT DE NEMOURS & COMPANY, INC.
PONTCHARTRAIN SITE
LA PLACE, LOUISIANA
P-PHENYLENEDIAMINES (DIAMINES) UNIT

COMPLIANCE CERTIFICATION STATEMENT PER PARA 63.118(h)(3) FOR SOCMI HON SUBPART G

E. I. DuPont de Nemours & Co., Inc., located at the Pontchartrain Site, will comply with the provisions of §63.113 of this subpart for Group 1 process vents by the dates specified in subpart F.

I certify that DuPont will comply with the provisions of §63.113 of Subpart G for Group 1 process vents as expeditiously as practicable, but in no event later than 3 years after the emission point becomes Group 1, as specified in subpart F of this part.

Signature: _____ Date: May 14, 2015
Ivan Caldwell, Plant Manager

E. I. DU PONT DE NEMOURS & COMPANY, INC.
PONTCHARTRAIN SITE
LA PLACE, LOUISIANA
P-PHENYLENEDIAMINES (DIAMINES) UNIT

Semi-Annual Periodic Report for
September 19, 2014 through March 18, 2015

Per 40 CFR 63.152(c)(2), this Periodic Report includes all information specified in 63.117 and 63.118 for process vents, 63.122 for storage vessels, 63.129 for transfer operations, and 63.146 for process wastewater. This report covers the period from September 19, 2014 to March 18, 2015.

PROCESS VENTS

40 CFR 63.118(f):

The following Group 1 process vents are routed to the Flammable Vent Header Flare #1 (1500-34) and the Flammable Vent Header Flare #2 (1500-66): the High Boiler Column (1500-34I), the IPP Column (1500-34J), the Low Boiler Column (1500-34K), and the Refining Column (1500-34L).

(1) Daily average values outside ranges established in Notification of Compliance Status:

Not applicable. The Flammable Vent Header Flare#1, 1500-34 and the Flammable Vent Header Flare #2, 1500-66, are used to control all Group 1 process vent emissions. Per 40 CFR 63.118(a)(5), for flares, records of the time and duration of all periods during which the pilot flame is absent shall be kept rather than daily averages. The Primary Flare used is the Flammable Vent Header Flare #2 (1500-66), and the original Flammable Vent Header Flare (1500-34) is used as a backup.

(2) For Group 1 points, duration of periods when monitoring data is not collected for each excursion caused by insufficient monitoring data:

There were no instances of insufficient reporting during this monitoring period. See Table 1 attached.

(3) Time and duration of all periods when the vent stream is diverted from the control device through a bypass line:

Exempt: Per 40 CFR 63.114(d), equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to this paragraph. The only existing bypass lines that could divert a vent stream away from the control device are there for safety purposes and are, therefore, exempt from this requirement.

(4) Periods in which the seal mechanism is broken, the bypass line valve position has changed, or the key to unlock the bypass line valve was checked out:

Exempt: See (3) above.

(5) Time and duration of all periods in which the pilot flame of the Flammable Vent Header Flare, 1500-34, and the Flammable Vent Header Flare #2, 1500-66 were absent:

There were no outages of the Flammable Vent Header Flare #1, 1500-34, and the Flammable Vent Header Flare #2, 1500-66, during this reporting period. See attached Table 2.

(6) Carbon bed regeneration cycles:

Not applicable. Carbon beds are not used as control devices for Group 1 process vents.

40 CFR 63.118(g),(h),(i),and (j):

There were no process changes made during this report period that caused a Group 2 process vent with a TRE greater than 4.0 to become a Group 2 process vent with a TRE less than 4.0, a Group 2 process vent with a flow rate less than 0.005 scm per minute to become a Group 2 process vent with a flow rate of 0.005 scm per minute or greater with a TRE less than or equal to 4.0, or a Group 2 process vent with an organic HAP concentration less than 50 ppm to become a Group 2 process vent with an organic HAP concentration of 50 ppm or greater with a TRE less than or equal to 4.0.

Although there were no process changes made during this report period that caused a Group 2 process vent to become a Group 1 process vent, the Group Determination for the Ammonia Recover Column (EQT067, 1500-60D) TRE calculation was updated. No process changes have occurred. The original calculation was based upon the original design sheets of the plant. Recently, some of the plant process streams were modelled in ASPEN, which is the source of the mass flow rates and mole fractions for the equipment controlled by the Ammonia Recovery Flare (EQT063, 1500-60), also known as the Synthesis flare. The Ammonia Recovery Column is now a Group 1 source, and the new TRE index is 0.21. The updated calculation sheet has been included with this report.

The Synthesis flare temperature is currently monitored by a set of thermocouples to ensure presence of a flame. Also, according to 63.116(a), a visible emission test will be conducted for the flare, and the net heating value of the gas being combusted and the exit velocity is being determined. Additionally, DuPont is moving forward with the plan to install a flow meter from the Ammonia Recovery Column to the Synthesis Flare. The engineering portion for the Ammonia Recovery Column flow monitoring system is nearly complete. The system is going to use orifice plate technology along with a Rosemount 3051 type DP flow meter. The system will connect to our Honeywell Experion DCS for monitoring. The design portion is anticipated to start in May. The system will be installed during the fall shutdown, which is tentatively scheduled for October. The change to regulatory applicability has been included in the recent renewal of the Diamines Title V permit application.

See Table 3, Process Changes Affecting Process Vent Classifications, attached.

STORAGE VESSELS

40 CFR 63.122(g):

Closed vent systems and control devices are used to control emissions from Group 1 storage vessels, the Crude Storage Tank (1500-8A), the Hydrogenate Storage Tank (1500-38A), and Hydrogenate Tank No. 2 (1500-56B). The control devices used to control emissions from these storage vessels are the Crude Storage Tank Scrubber (1500-8), the Hydrogenate Storage Tank Scrubber (1500-38), and Flammable Vent Header #2 (1500-66)/Flammable Venter Header #1.

(1) Planned routine maintenance operations that would require the control device to not meet the 95% efficiency emission control requirements:

A description of the planned routine maintenance on the control devices which was performed during the previous six months is presented in Table 4. There were maintenance outages on all four devices totaling 2,484.75 hours during the reporting period. Anticipated maintenance during the next six months is presented in attached Table 5.

(2) For control devices other than a flare, the occurrence when the monitored parameters were outside the parameter ranges documented in the Notification of Compliance Status:

There were no excursions during this monitoring period. See attached Table 6.

(3) For flares, the occurrence when the control device did not meet the general control device requirements per 63.11(b):

There was no occurrence when the flare did not meet the general control device requirements. The flare is used to control emissions from 1500-56B Hydrogenate Storage Tank No. 2, a HON Group 1 storage vessel, as of June 29, 2013. (Note that Flammable Vent Header Flare

#1, 1500-34 and the Flammable Vent Header Flare #2, 1500-66 are used to control emissions from a Benzene storage tank covered and reported under the Benzene NESHAP program).

TRANSFER OPERATIONS

40 CFR 63.130(d):

Periodic Report information shall be submitted for transfer racks subject to the requirements of 63.126:

Not applicable. Per 40 CFR 63.126(c), recordkeeping provisions are the only requirement for Group 2 transfer operations. All transfer operations sources are Group 2. No changes in design annual throughput, material loaded, or vapor pressure at transfer racks occurred during this reporting period.

PROCESS WASTEWATER

40 CFR 63.146(c),(d),(e),(f),(g):

Not applicable. All process wastewater sources are Group 2. No changes in average flowrate or average VOHAP concentration for wastewater streams occurred during this reporting period.

LEAK INSPECTIONS

40 CFR 63.148(k):

The closed vent systems subject to these provisions are also subject to 63.172 of subpart H; therefore, leak inspections are conducted according to requirements of 63.172.

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PART 63.118(f)(2)

TABLE 1
INSUFFICIENT MONITORING DATA FOR PROCESS VENT CONTROL DEVICES

Report Period
September 19, 2014 to March 18, 2015

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH	EQUIP. NO.	EQUIP. NAME	CAUSE OF MALFUNCTION
There was no insufficient monitoring during this reporting period.							

DUPONT PONTCHARTRAIN WORKS DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL
PER PART 63.118(f)(5)

TABLE 2
FLAMMABLE VENT HEADER FLARE OUTAGES

Report Period
September 19, 2014 to March 18, 2015

DATE	TIME START	TIME STOP	TIME LENGTH HRS	EQUIP. NO.	TYPE OF MALFUNCTION	CAUSE OF MALFUNCTION	COMMENTS
There were no outages of the Flammable Vent Header Flare or the Ammonia Recovery Flare during this monitoring period.							

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PART 63.118(g), (h), (i), (j)

TABLE 3
PROCESS CHANGES AFFECTING PROCESS VENT CLASSIFICATIONS

Report Period
September 19, 2014 to March 18, 2015

PROCESS VENT NO.	PROCESS VENT NAME	GROUP PRIOR TO PROCESS CHANGE	DESCRIPTION OF PROCESS CHANGE	RESULTS OF RECALCULATION	CONTROL DEVICE FOR COMPLIANCE*

1500-60D	PPDa/NH3 Recovery Column	Group 2	No process changes have occurred. The original calculations were based upon the original design sheets of the plant. Recently, some of the process streams were modelled in ASPEN, which is the source of the mass flow rates and mole fractions for the equipment controlled by the Synthesis flare.	TRE = 0.21, Group 1	Ammonia Recovery Flare (EQT063, 1500-60) (Synthesis Flare)

* If process changes were made which changed the classification of a process vent, a statement that the owner or operator will comply with all applicable provisions of 40 CFR 63.113 must also be provided with this report.

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PART 63.122(g)(1)

TABLE 4
PAST MAINTENANCE FOR CONTROL DEVICES

Report Period
September 19, 2014 to March 18, 2015

MAINTENANCE PERFORMED DURING THE PAST 6 MONTHS					
EQUIP. NO.	EQUIPMENT NAME	TYPE OF MAINTENANCE PERFORMED	FREQUENCY OF MAINTENANCE	DATE PERFORMED	TIME LENGTH
1500-8	Crude Tank Scrubber	Problems with letdown of scrubber	As needed.	11/8/2014	2.25 hours
1500-8	Crude Tank Scrubber	Problems with letdown & pump	As needed.	11/8/2014	18 hours
1500-8	Crude Tank Scrubber			Total	20.25 hours
1500-34	Flammable Vent Header Flare #1	Both flares were taken out of service during the plant outage on 10/31/2014 00:45. All pieces of equipment that vent to the flares were either clear of material or stilled and tagged out with no make or take to the tank. The plant was in a shutdown at the time, and no equipment was venting to the flares. The flares were put back in service on 11/18/2014 at 21:55.	As needed.	10/31/2014	452.5 hours
1500-34	Flammable Vent Header Flare #1			Total	452.5 hours
1500-38	Hydrogenate Tank Scrubber	Maintenance - mechanical problems	As needed.	11/1/2014	24.0 hours
1500-38	Hydrogenate Tank Scrubber	Swap solenoid on control valve	As needed.	11/7/2014	0.12 Hours
1500-38	Hydrogenate Tank Scrubber	Steaming the scrubber.	As needed.	1/16/2014	1.15 hours
1500-39	Hydrogenate Tank Scrubber	Flow auto was shutoff for maintenance	As needed.	3/3/2015	20.62 hours
1500-40	Hydrogenate Tank Scrubber	Flow interlocking (7051PG)	As needed.	3/3/2015	0.17 hours
1500-41	Hydrogenate Tank Scrubber	Steaming scrubber/Maint working on 7051PG interlock	As needed.	3/3/2015	0.63 hours
1500-38	Hydrogenate Tank Scrubber	Steaming the scrubber.	As needed.	3/7/2015	0.83 hours
1500-38	Hydrogenate Tank Scrubber	Steaming the scrubber.	As needed.	3/8/2015	2.75 hours
1500-38	Hydrogenate Tank Scrubber	Steaming the scrubber.	As needed.	3/9/2015	1.38 hours
1500-38	Hydrogenate Tank Scrubber	Steaming the scrubber.	As needed.	3/10/2015	0.25 hours
1500-38	Hydrogenate Tank Scrubber	Steaming the scrubber.	As needed.	3/12/2015	0.25 hours
1500-38	Hydrogenate Tank Scrubber	Steaming the scrubber.	As needed.	3/13/2015	0.58 hours
1500-38	Hydrogenate Tank Scrubber	Steaming the scrubber.	As needed.	3/13/2015	0.7 hours
1500-38	Hydrogenate Tank Scrubber	Steaming the scrubber.	As needed.	3/15/2015	1.25 hours
1500-38	Hydrogenate Tank Scrubber	Steaming the scrubber.	As needed.	3/17/2015	0.5 hours
1500-38	Hydrogenate Tank Scrubber			Total	55.18 hours

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PART 63.122(g)(1)

TABLE 4
PAST MAINTENANCE FOR CONTROL DEVICES

Report Period
September 19, 2014 to March 18, 2015

MAINTENANCE PERFORMED DURING THE PAST 6 MONTHS					
EQUIP. NO.	EQUIPMENT NAME	TYPE OF MAINTENANCE PERFORMED	FREQUENCY OF MAINTENANCE	DATE PERFORMED	TIME LENGTH
1500-60	Ammonia Recovery Flare	FLARE STACK IN SYN TAGGED FOR MAINT WORK. Flare was taken out of service during the plant outage on 10/28/2014 12:55. All pieces of equipment that vent to the flare were clear of material. The plant was in a shutdown at the time, and no equipment was venting to the flare. The flare was put back in service on 11/18/2014 at 08:49.	As needed.	10/28/2015	500.57 hours
1500-60	Ammonia Recovery Flare	Synthesis flare down for mait work. Flare was taken out of service during the plant outage on 2/24/2015 at 22:50. All pieces of equipment that vent to the flare were clear of material. The plant was in a shutdown at the time, and no equipment was venting to the flare. The flare was put back in service on 3/3/2015 at 22:08.	As needed.	2/24/2015	167.3 hours
1500-60	Ammonia Recovery Flare				667.87 hours
1500-66	Flammable Vent Header Flare #2	Both flares were taken out of service during the plant outage on 10/31/2014 00:45. All pieces of equipment that vent to the flares were either clear of material or stilled and tagged out with no make or take to the tank. The plant was in a shutdown at the time, and no equipment was venting to the flares. The flares were put back in service on 11/18/2014 at 21:55.	As needed.	10/31/2014	452.5 hours
1500-66	Flammable Vent Header Flare #2			Total	452.5 hours

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PART 63.122(g)(1)

TABLE 5
PLANNED MAINTENANCE FOR CONTROL DEVICES

Report Period
September 19, 2014 to March 18, 2015

MAINTENANCE ANTICIPATED TO BE PERFORMED WITHIN THE NEXT 6 MONTHS				
EQUIP. NO.	EQUIPMENT NAME	TYPE OF MAINTENANCE	FREQUENCY OF MAINTENANCE	TIME LENGTH ESTIMATE
1500-8	Crude Tank Scrubber	Routine Yearly Maintenance	As needed	NA
1500-34	Flammable Vent Header Flare No. 1	Routine Yearly Maintenance	As needed.	<72hours
1500-38	Hydrogenate Tank Scrubber	Routine Yearly Maintenance	As needed.	NA
1500-60	Ammonia Recovery Flare	Routine Yearly Maintenance	As needed.	<240hours

*The Diamines Title V Permit (2090-V6) authorizes construction and operation of the Flammable Vent Header Flare No. 2 (1500-66) as the primary flare. The existing Flammable Vent Header Flare (1500-34) shall be used only when the primary flare is down.

1500-66	Flammable Vent Header Flare No. 2	Routine Yearly Maintenance	Maintenance scheduled for October 2015 S/D.	<72hours

*The Diamines Title V Permit (2090-V6) authorizes construction and operation of the Flammable Vent Header Flare No. 2 (1500-66) as the primary flare. The existing Flammable Vent Header Flare (1500-34) shall be used only when the primary flare is down.

DUPONT PONTCHARTRAIN WORKS P-PHENYLENEDIAMINE DIAMINES UNIT
COMPLIANCE DOCUMENTATION FOR SOCMI HON SUBPART G
SEMI-ANNUAL REPORT OF EMISSION CONTROL PER PARA 63.122(g)(2)

TABLE 6: MONITORED PARAMETER EXCURSIONS FOR STORAGE VESSELS

Report Period
September 19, 2014 to March 18, 2015

DATE START	TIME START	DATE STOP	TIME STOP	TIME LENGTH hrs:min	EQUIP. NO.	EQUIP. NAME	CAUSE OF MALFUNCTION
					1500-38	Hydrog Tank	There were no excursions during this monitoring period.
					1500-8	Crude Tank	There were no excursions during this monitoring period.

Strm Table Row	8	Strm from FAA **1522-1504**		Strm Name	**NH3 Rev Col Proc Vent**
Vent Number	1500-60	Misc Comments		Operation	**normal**

Vent SOC Conditions:

Process SOC	SP 07706	Loop No	Min	Norm from	Norm to	Max	Description
SOC ver, date	2, 5/94	1556TG, C		50	60	60	NH3 Col Top Temp
P&I No	966987	1553PC,psig	3	3	4	7	NH3 Col Top Pres Cntl

Vent av T, C	25	Vent P, mm Hg	915.10	Vent P, psia	17.70	Vent P, psig	3.00

Nitrogen Purge Losses:

Chem Den (w/o N2) Wv, lb/(	0		N2 pph	0.00	Org Loss,pph	0.00
where Lp = 365 * 24 Wv Ks Vn		N2 Purge Count	N2 Purge SCFI	Misc SCFH	Tot N2 SCFH	N2,ACFH @T&P
N2 Purge Loss Lp, ppy=	**0.00**	0	2	0	0.0	0.00
		0		0		1.00 K

Vacuum Pump Design Basis	Vac Pump FAA n **#N/A**			Vac Pmp Name	
Vac Pump Hp	Misc Comments			BPF No, Dwgs	
Model	Ser No		APC No		P&I No
N2/Air pph	0.00	N2/Air SCFH	0.00	Oper T, C	Oper P,mm Hg
Tot Strm pph	0.00	Dry Strm ACFH	0	Strm av MW	w/o N2 av MW

N2 pph basis per 40 CFR 63.115(d)(iii)(D)(2) = Est of max flow based on phys equip design such as blower capacity

Vacuum Leakage Losses:

				Org Loss,pph	0.00
Air Leak Loss Lp, ppy=	**0**	based on	N2,Air pph 0.00	N2,Air SCFH	0.00

Vent Emission Loss Summar		1.00	PFD Reference	Phase = Vap	Dwg = 6387	strm = 533	90 pph
Sample SOC	SP xxxxx	SOC ver, date		Sample Code	0		
Chemical	MW	Liq Weight %	PP@T In,mmHG	N2 purge ppl	Air leak pph	Free Vapor ppl	Total pph
1 Water	18	0.0 000	0.000	0.000	0.000	35.22	35.22
2 Ammonia	17.03	0.0 000	0.000	0.000	0.000	41.71	41.71
3 Benzene	78.108	0.0 000	0.000	0.000	0.000	0.10	0.10
4 20% HNO3	63.02	0.0 000	0.000	0.000	0.000	0.00	0.00
5 Aniline	93.12	0.0 000	0.000	0.000	0.000	17.06	17.06
6	1	0.0 000	0.000	0.000	0.000	0.00	0.00
7	1	0.0 000	0.000	0.000	0.000	0.00	0.00
8 Hydrogen	2.016	0.0 000	0.000	0.000	0.000	6.20	6.20
9 Nat Gas	19	0.0 000	0.000	0.000	0.000	0.00	0.00
10 Carb Monoxide	28.01	0.0 000	0.000	0.000	0.000	0.00	0.00
11 NO	30.01	0.0 000	0.000	0.000	0.000	0.00	0.00
12 NO2	44.02	0.0 000	0.000	0.000	0.000	0.00	0.00
13 Oxygen	32	0.0 000	0.000	0.000	0.000	0.00	0.00
14 Carb Dioxide	46	0.0 000	0.000	0.000	0.000	0.00	0.00
15 Nitrogen	28	0.0 000	0.000	0.000	0.000	2.60	2.60
total	0.000 a	0.0 000	0.0000	0.000	0.000	102.89	102.89
%NH3 in water	0.0%	%HNO3 in wate	0.00%	Tot Strm MW	13.261	Tot Strm SCFH	2,987.41

TRE Calculation Table 1: < < (40 CFR 63 Part F, Table 2) > > < 40 CFR 63.115(d)(2)(iii) >

	Chemical	moles per hr	mole frac (Cj/MM	Table 2 OHAP '	HAP Loss,pp	OHAP vol ppm	Ht Organic ?	Cj-Ht vol ppm
1	Water	1.9 567	0.252 193	No	0.000	0	No	0
2	Ammonia	2.4 492	0.315 676	No	0.000	0	No	0
3	Benzene	0.0 013	0.000 165	Yes	0.100	165	Yes	165
4	20% HNO3	0.0 000	0.000 000	No	0.000	0	No	0
5	Aniline	0.1 832	0.023 613	Yes	17.060	23,613	Yes	23,613
6		0.0 000	0.000 000	No	0.000	0	No	0
7		0.0 000	0.000 000	No	0.000	0	No	0
8	Hydrogen	3.0 754	0.396 385	No	0.000	0	Yes	396,385
9	Nat Gas	0.0 000	0.000 000	No	0.000	0	Yes	0
10	Carb Monoxide	0.0 000	0.000 000	No	0.000	0	Yes	0

11	NO	0.0 000	0.000 000	No	0.000	0	No	0
12	NO2	0.0 000	0.000 000	No	0.000	0	No	0
13	Oxygen	0.0 000	0.000 000	No	0.000	0	No	0
14	Carb Dioxide	0.0 000	0.000 000	No	0.000	0	No	0
15	Nitrogen	0.0 929	0.011 968	No	0.000	0	No	0
	total	7.7 586	1.000 000		17.160	23,778		420,163

Strm Table Row	8	Strm from FAA **1522-1504**		Strm Name	**NH3 Rev Col Proc Vent**
Vent Number	1500-60	Misc Comments		Operation	**normal**

TRE Calculation Table 2: < < < 40 CFR 63.115(d)(2)(iii) > > < < < 40 CFR 63.115(d)(2)(iv) > > >

	Chemical	Ht Val,BTU/lb	Ht Val,BTU/hr	Hj-K Cal/gmole	cj * Hj	Etoc Organic?	Cj-Etoc vol ppm	cj * Mj
1	Water	0	0	0.00	0	No	0	0
2	Ammonia	8,000	333,680	75.69	0	No	0	0
3	Benzene	17,256	1,726	748.80	123,562	Yes	165	12,889
4	20% HNO3	0	0	0.00	0	No	0	0
5	Aniline	15,667	267,279	810.51	19,138,518	Yes	23,613	2,198,847
6		0	0	0.00	0	No	0	0
7		0	0	0.00	0	No	0	0
8	Hydrogen	51,543	319,567	57.73	22,882,570	No	0	0
9	Nat Gas	20,000	0	211.11	0	No	0	0
10	Carb Monoxide	2,415	0	37.58	0	No	0	0
11	NO	0	0	0.00	0	No	0	0
12	NO2	0	0	0.00	0	No	0	0
13	Oxygen	0	0	0.00	0	No	0	0
14	Carb Dioxide	0	0	0.00	0	No	0	0
15	Nitrogen	0	0	0.00	0	No	0	0
	total		922,251		42,144,649		23,778	2,211,736

40 CFR 63.115(d)(2)(iii) Ht Calculation where Ht = K1 * [Sum (Cj * Hj)] * (1 - Bw)

Ht-Net Heating Value, megaJoules/M3:		**5.4838**	K1 Constant	1.7400E-07	Bw-% Vol H2C 25.22%
Ht-Net Heating Value, BTU / M	5,200	Ht-Net Heating Value, BTU /	439,902		Wet Tot M3/Mi 1.410
Ht-Net Heating Value, BTU / S	147.25	Ratio of Ht to BTU Sum,	47.7%		Dry Tot M3/Mi 1.060
		NH3 Portion of BTU Sun	36.2%		

40 CFR 63.115(d)(2)(iv) E toc Calculation where E toc = K2 * [Sum (Cj * Mj)] * Qs toc=tot org comp

E toc - Emission Rate of TOC, Kg/Hr:	**5.846**	K2 Constant	2.4940E-06	**Qs, M3/Min**	**1.0598**
E-Emission Rate of TOC, Lb/Hr	12.888	Ratio [E toc/pph page 1]	75.102%	**E hap,Kg/Hr**	**7.7837**

40 CFR 63.115(d)(3)(i) TRE Index Calculation (Total Resource Effectiveness) w TRE = 1 / Ehap (a + b Qs + c Ht + d Etoc)

	TRE Index Value	Lowest TRE >=	G Table 1 Exist Source Cont Dev B	Coeff a	Coeff b	Coeff c	Coeff d
	0.24	**No**	Non Halog, Flare	1.935	3.660E-01	-7.687E-03	-7.333E-04
>>	0.21	**No**	Non Halog, Thrm Incin, 0% HR	1.492	6.267E-02	3.177E-02	-1.159E-03
	0.37	**No**	Non Halog, Thrm Incin, 70% HR	2.519	1.183E-02	1.300E-02	4.790E-02

40 CFR 63.111 Group 1 or 2 Determination where the vent is either group 1 (all 3 cond) or group 2

Group 1 = meets all 3 condition		Flow, M3/min >	0.005	Org HAP, ppm	50	TRE Index <=	1.0
Actual Vent Conditions:		Flow, M3/min =	**1.0598**	Org HAP, ppm	**23,778**	TRE Index =	**0.21**
Group 2 = meets any of 3 condi		Flow, M3/min <	0.005	Org HAP, ppm	50	TRE Index >	1.0
Actual Vent =	**Group 1**	Flow, M3/min =	Group 1	Org HAP, ppm	Group 1	TRE Index =	Group 1

In Ht calculations, Cj = all organics + H2 & CO

In E toc calculations, Cj = all organics except Methane & Ethane

AI/AI/CO 1100253294 41

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DuPont
Pontchartrain Site
586 Highway 44
LaPlace, LA 70068-6908

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JUN 12 2015

Air Toxics & Inspection Coordination Branch
6EN-A

June 8, 2015

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, La. 70821-4312

CERTIFIED MAIL NO. 7011 3500 0001 6350 1421

Re: DuPont – Pontchartrain Site – AI#38806
Polymers and Resins Group I MACT (40 CFR Part 63, Subpart U)
Periodic Report (non-LDAR) for November 16, 2014 through May 15, 2015

Enclosed is the non-equipment leak Periodic Report under 40 CFR Part 63, Subpart U, of the Polymers & Resins Group I MACT regulation, for the DuPont Neoprene Unit located in LaPlace, Louisiana. As required by 40 CFR §63.506(e)(6)(i), this non-equipment leak Periodic Report covers the 6-month period beginning November 16, 2014 and ending on May 15, 2015.

A detailed analysis of the Periodic Report elements in 40 CFR §63.506(e)(6) is attached. Those applicable and not applicable (N/A) to the Neoprene Unit are noted.

If you have any questions or need additional information, you can contact me at (985) 536-5437 or at Doris.B.Grego@usa.dupont.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P. E.
Senior Environmental Consultant

Enclosures

cc: U.S. EPA Region 6
Air Enforcement Section
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7011 3500 0001 6350 1438

DUPONT

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

TITLE V OPERATING PERMIT NO. 2249-V7

P&R I MACT – PERIODIC REPORT (non-LDAR)

STARTING DATE: NOVEMBER 16, 2014

ENDING DATE: MAY 15, 2015

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Ivan D. Caldwell
Responsible Official's Title	Plant Manager
Signature	Ivan D. Caldwell
Date Signed	June 4, 2015

Analysis of Periodic Reporting Requirement of Polymers & Resins Group I MACT, 40 CFR Part 63, Subpart U, §63.506(e)(6)
Periodic Report (non-LDAR) for DuPont
Pontchartrain Site, LaPlace, Louisiana
Reporting period beginning on November 16, 2014 and ending on May 15, 2015

40 CFR §63.506(e)(6)(i). Frequency of reporting and time period covered.

This paragraph refers to paragraphs (e)(6)(xi) and (e)(6)(xii) of §63.506 as potentially applicable exceptions to the requirement to submit semiannual Periodic Reports. Paragraph (e)(6)(xi) addresses emission points included in an emissions average. The affected Elastomer Product Process Unit (EPPU) is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in paragraph (e)(6)(xi) is not applicable (N/A).

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with these limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had no control or recovery devices for a particular emission point or process section that had excursions, as defined in §63.505(g).

The second requirement concerning quarterly reporting under paragraph (e)(6)(xii) relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(*2*). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

In the absence of a requirement to submit quarterly reports, Periodic Reports are required semiannually by paragraph (e)(6)(i). The first report was required to be submitted no later than 240 days after the date the Notification of Compliance Status was due. The Notification of Compliance Status submittal deadline was November 16, 2001. The date 240 days after the November 16, 2001 date is July 14, 2002. In addition, the first Periodic Report was required to address the six-month period beginning on the date that the Notification of Compliance Status was due. Periodic Report #1 (non-LDAR) thus covered the reporting period beginning on November 16, 2001, and ending on May 15, 2002. This Periodic Report covers the six-month reporting period, beginning on November 16, 2014 and ending on May 15, 2015.

<u>40 CFR §63.506(e)(6)(ii)</u>. Content of Periodic Reports under certain conditions.

If during the reporting period, the affected source experienced none of the compliance exceptions or activities identified in §§63.506(e)(6)(iii) through (e)(6)(ix), then the Periodic Report is to take the short form. In this case, the Periodic Report should contain a statement that there were no compliance exceptions as specified in paragraphs (e)(6)(iii) through (e)(6)(ix) of §63.506 for the six-month period covered by the report, and that none of the activities specified in those same paragraphs occurred during the same six-month period.

<u>40 CFR §63.506(e)(6)(iii)</u>. Content of Periodic Reports under all other conditions.

This paragraph references specific information to be provided in the Periodic Report if the conditions in the preceding paragraph (e)(6)(ii) were not met during the reporting period. The paragraph applies to affected sources subject to §63.484 through 63.501 for any emission point. This equates to affected sources subject to Subpart U and having specific applicable requirements for any combination of storage vessels, continuous front-end process vents, batch front-end process vents, back-end process vents, or process wastewater. The affected EPPU identified its specific applicable requirements in its Notification of Compliance Status submittal.

The affected EPPU notes that §63.501(a) identifies the applicable requirements for maintenance wastewater as §63.105(a). The applicable requirements for maintenance wastewater do not include any requirement to report information in the Periodic Reports required by §63.506(e)(6).

40 CFR §63.506(e)(6)(iii)(A). Cross-references to specific reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Cross-reference (40 CFR)	Required Information and Applicability
§63.122(a)(4) for storage vessels	Relates to Group 1 storage vessels (N/A)
§§63.117(a)(3), 63.118(f), and 63.485(s)(5) for continuous front-end process vents	§63.117(a)(3) relates to TRE determinations or performance tests conducted after the Notification of Compliance Status (NoCS) has been submitted. - The affected EPPU had no process changes during this reporting period that required a recalculation of the TRE index value. - The affected EPPU conducted no performance tests during this reporting period. §63.118(f)(1) relates to daily average values of monitored parameters for all operating days when daily average values recorded were outside the levels established in the NoCS or the Title V operating permit - The affected EPPU had no such days during this reporting period. §63.118(f)(2) relates to Group 1 emission points with excursions caused by insufficient monitoring data (N/A). §63.118(f)(3) relates to the times and durations of periods recorded when the vent stream is diverted from its control device through a bypass line (N/A). §63.118(f)(4) relates to periods recorded when the seal mechanism was broken, the bypass line valve position was changed, or the key to unlock the bypass line valve was checked out (N/A). §63.118(f)(5) relates to periods when all pilot flames of a flare were absent (N/A). §63.118(f)(6) relates to carbon bed regeneration cycles with recorded parameters outside the levels established in the NoCS or the Title V operating permit (N/A). §63.485(s)(5) relates to Group 1 continuous front-end process vents controlled using an internal combustion engine (N/A).
§63.492 for batch front-end process vents and aggregate batch vent streams	§63.492(a) relates to information required in the NoCS (N/A). §63.492(b) relates to process changes causing a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. §63.492(c) relates to process changes that – - cause a Group 2 batch front-end process vent with annual emissions less than 11,800 kg/year to have annual emissions greater than or equal to 11,800 kg/year but not changing the Group 2 status of the batch front-end process vent. - The affected EPPU had no such process changes during the reporting period. - or require redetermination of the batch mass input limitation (N/A). §63.492(d) specifies process changes for which reporting is not required (N/A).

Cross-reference (40 CFR)	Required Information and Applicability
§63.492 for batch front-end process vents and aggregate batch vent streams (continued)	§63.492(e) relates to information required in the Precompliance Report for alternative control devices or alternative monitoring parameters (N/A). §63.492(f) relates to affected sources required to monitor bypass lines around control devices per §63.489(d) (N/A).
§63.494 for back-end process operations	Total amount of Neoprene manufactured between May 2014 and April 2015 = 63.82 MM pounds. HAP emissions from the back end process = 54,786 pounds. Residual Factor 0.00086
§63.104(f)(2) for heat exchange systems	Addresses reporting requirements if the delay-of-repair provisions are invoked (N/A). Note: The affected EPPU has heat exchange systems meeting the condition specified in §63.104(a)(1)—that the heat exchange systems are operated with the minimum pressure on the cooling water side at least 35 kilopascals greater than the maximum pressure on the process side. Accordingly, the requirements of §63.104(a)(1) do not apply to the affected EPPU.
§63.146(c) – (g) for process wastewater	§63.146(c) relates to waste management units that receive, manage, or treat Group 1 process wastewater stream(s) or residual(s) removed from Group 1 process wastewater stream(s) (N/A). §63.146(d) relates to treatment processes for Group 1 process wastewater streams and/or residuals removed from Group 1 wastewater streams (N/A). §63.146(e) relates to control devices for organic HAP emissions from Group 1 process wastewater streams (N/A). §63.146(f) relates to owners or operators who have obtained approval to use an alternative treatment process or control device or to monitor a set of alternative parameters and therefore have alternate reporting requirements (N/A). §63.146(g) relates to extensions of time to empty and remove a Group 1 process wastewater tank equipped with a floating roof from service for inspection or repairs to the floating roof per §63.133(e)(2) or for control equipment repair per §63.133(h) (N/A)

40 CFR §63.506(e)(6)(iii)(B). Reporting requirements for excursions.

This paragraph requires the owner or operator of the affected EPPU to report the daily average values or batch cycle daily average values of monitored parameters for each excursion.

Excursions are defined by paragraphs (g) and (h) of §63.505. As noted above, §63.505(h) does not apply to the affected EPPU but §63.505(g) does. In addition, for excursions caused by lack of monitoring data, the owner or operator is to specify the start time and duration of each period when monitoring data were not collected.

No excursions were experienced during this reporting period.

40 CFR §63.506(e)(6)(iii)(C). [Reserved.]

40 CFR §63.506(e)(6)(iii)(D). Additional reporting requirements.

This paragraph identifies reporting elements as listed in the following table.

Citation (40 CFR §63.506)	Required Information and Applicability
(e)(6)(iii)(D)(*1*)	Supplements to the Emissions Averaging Plan, if any, per paragraph (e)(4)(iii) (N/A).
(e)(6)(iii)(D)(*2*)	Notification if a process change is made that changes the group status of any emission point from Group 2 to Group 1. - The affected EPPU had no such process changes during the reporting period.
(e)(6)(iii)(D)(*3*)	Notification of addition of one or more emission points or EPPUs to the affected source, with description and notification of the group status of the additional emission point or of all emission points in the EPPU. - The affected EPPU added no emission points or EPPUs during the reporting period.
(e)(6)(iii)(D)(*4*)	For EPPUs producing styrene-butadiene rubber by an emulsion process, notification of changes in standard operating procedures affecting carbon disulfide concentration in crumb dryer exhaust (N/A).
(e)(6)(iii)(D)(*5*)	Changes in the identity of the treatment facility or transferee receiving process wastewater streams for treatment pursuant to §63.132(g) (N/A).

40 CFR §63.506(e)(6)(iii)(E). Start-up, shutdown, and malfunction reports.

[Please note that the U.S. Environmental Protection Agency amended 40 CFR §63.10(d)(5)(i) and the final rule was published in the Federal Register on May 30, 2003 (68 FR 32586). This notice requires the submittal of a Shutdown and Malfunction Report with the Periodic Reports. The Neoprene Unit has procedures in place that meet the requirements of this regulation. Since this facility does not have a Group 1 source, it is our understanding, based on 40 CFR §63.506(b)(i), that a Shutdown and Malfunction Report is not required.]

This paragraph refers to the information required by paragraph (b)(1)(ii) of §63.506. In turn, §63.506(b)(1)(ii) requires semiannual start-up, shutdown and malfunction reports to be submitted on the same schedule as the non-LDAR Periodic Reports and to include the information specified in §63.10(d)(5)(i).

The affected EPPU notes, however, that paragraph (b)(1) of 40 CFR §63.506 does not require the owner or operator of an affected source to include Group 2 emission points in the written start-up, shutdown and malfunction plan unless the Group 2 emission points are included in an emissions average. Further, this paragraph limits the start-up, shutdown and malfunction plan requirement to control devices for equipment leaks and makes it optional for other equipment. The affected EPPU has no Group 1 emission points and no control devices for equipment leaks. Accordingly, the affected EPPU asserts that it is not required to develop and implement a written start-up, shutdown and malfunction plan pursuant to §63.506(b)(1).

Furthermore, §63.506(b)(1) states in its final sentence that reports related to the plan shall be submitted as specified in paragraph (b)(1)(ii) of §63.506. If the affected EPPU is not required by §63.506(b)(1) to have a written start-up, shutdown and malfunction plan, the affected EPPU asserts that it is also not required to submit reports related to that plan.

40 CFR §63.506(e)(6)(iv). Batch mass input limitation.

This paragraph requires the owner or operator to report once per year (i.e., in every other Periodic Report) the mass of HAPs or material input to the batch unit operation during the 12-month period covered by the current and previous Periodic Reports. In addition, the owner or operator must state whether the batch front-end process vent subject to the batch mass input limitation complied with the batch mass input limitation.

The affected EPPU indicated in its Notification of Compliance Status submittal that its determination of the group status of its set of batch front-end process vents was based on annualized emissions from maximum production of its single highest-HAP recipe. The result of this determination was that the affected EPPU's batch front-end process vents are Group 2. Consequently, the affected EPPU elected to comply with 40 CFR §63.487(g)(4) and §63.487(h). This compliance option does not require the affected EPPU to establish a batch mass input limitation. The affected EPPU made no recipe

changes during the reporting period that changed the identity or the composition of the single highest-HAP recipe on which this determination was based.

The election of the affected EPPU to comply with §63.487(h) for its batch front-end process vents invokes the reporting requirements of paragraphs (a)(5), (a)(6), and (b) of §63.492. The information in paragraphs (a)(5) and (a)(6) was included in the affected EPPU's Notification of Compliance Status submitted November 16, 2001, and is not required to be included in Periodic Reports.

§63.492(b) relates to process changes that cause a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. As noted in the table presented in the discussion above of reporting requirements under 40 CFR §63.506(e)(6)(iii)(A), the affected EPPU made no process changes during the reporting period that caused a Group 2 batch front-end process vent to become a Group 1 batch front-end process vent. Therefore, this Periodic Report is not required to include a notification and description of any process changes [as specified in 40 CFR §63.492(b).]

<u>40 CFR §63.506(e)(6)(v)</u>. Reporting of performance tests.

This paragraph specifies the information required for performance tests conducted during the reporting period. The affected EPPU did not conduct any performance tests during the period covered by this Periodic Report.

<u>40 CFR §63.506(e)(6)(vi)</u>. Change in primary product.

This paragraph requires notification of any change in the primary product of the affected EPPU. The affected EPPU did not change its primary product during the period covered by this Periodic Report.

<u>40 CFR §63.506(e)(6)(vii)</u>. Changes in predominant use determinations for storage tanks assigned to an affected EPPU.

The storage tanks at the affected EPPU did not require a predominant use determination. Therefore, this reporting requirement is not applicable (N/A).

<u>40 CFR §63.506(e)(6)(viii)</u>. Changes in predominant use determinations for recovery operations equipment assigned to an affected EPPU.

The recovery operations equipment at the affected EPPU did not require a predominant use determination. Therefore, this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(ix). Reduced recordkeeping program.

This paragraph requires notification of the owners or operator's election to comply with the recordkeeping provisions of §63.506(h)(1) as an alternative to the continuous operating parameter monitoring and recordkeeping provisions of Subpart U. The affected EPPU has made no such election, and therefore this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(x). Further reduced recordkeeping provisions.

This paragraph requires notification of the owner or operator's election not to retain daily average or batch cycle daily average values as a further reduction in recordkeeping for monitored parameters that would otherwise be subject to the Subpart U provisions for continuous operating parameter monitoring and recordkeeping, as provided by §63.506(h)(2). The affected EPPU notes that owners or operators wishing to avail themselves of this option must first comply with §63.506(h)(1) for at least six months with no excursions. The affected EPPU has not elected to comply with §63.506(h)(1). Accordingly, the affected EPPU is not eligible for this alternative, and this reporting requirement is not applicable (N/A).

40 CFR §63.506(e)(6)(xi). Quarterly reporting requirements for emission points included in an emissions average.

The affected EPPU is not using emissions averaging to demonstrate compliance with any applicable requirement. Therefore, the quarterly reporting requirement in this paragraph does not apply.

40 CFR §63.506(e)(6)(xii). Quarterly reporting requirements for emission points or EPPUs not included in an emissions average.

Paragraph (e)(6)(xii) addresses quarterly reporting requirements for emission points not included in an emissions average. The first requirement under this paragraph addresses the case of a control or recovery device for a particular emission point or process section that has had more excursions than the number of excused excursions. Excursions are defined in paragraphs (g) and (h) of §63.505. Paragraph (i) of §63.505 specifies the number of allowed excursions for each semiannual reporting period.

The affected EPPU notes that paragraph (h) of §63.505 pertains to back-end process operations subject to the residual organic HAP limitations in §63.494 and complying with the limitations using stripping technology. For the affected EPPU, this paragraph §63.505(h) is not applicable (N/A). However, the affected EPPU has recovery devices for certain continuous front-end process vents. These recovery devices have applicable parameter monitoring requirements to which the parameter monitoring excursion definition provided by §63.505(g) applies.

For the semiannual reporting period covered by this Periodic Report, the affected EPPU had no excursions as defined by this section

The second requirement under paragraph (e)(6)(xii) concerning quarterly reporting relates to requests by the Administrator (or permitting agency with delegated authority for enforcement of the applicable regulation) for quarterly reports for a particular emission point or process section. Neither the Administrator nor the Louisiana Department of Environmental Quality has requested quarterly reports for any emission point or process section within the affected EPPU, as provided by §63.506(e)(6)(xii)(A)(*2*). Therefore, the quarterly reporting requirement in §63.506(e)(6)(xii) does not apply.

40 CFR §63.499(f)(2) Residual Factor
[Total mass or organic HAP emitted divided by the total mass of elastomer produced.]

Applicable organic HAP emission limitation – The emission limitation for the production of neoprene shall be calculated by dividing 30 Mg/yr by the mass of neoprene produced in 2007 in Mg.

a. 2007 Neoprene Production = 73,017,000 pounds = 33,120 Mg
b. Emission Limitation = 30/33,120 = 0.00091

Month	Emissions (Pounds)	Production (Pounds)	Sum 12 months of Emissions	Sum 12 months of Production	Emiss/Prod 12 Months
May-14	4,752	6,091,631	48,491.00	57,004,651	0.00085
Jun-14	4,746	5,254,515	48,185.00	56,638,455	0.00085
Jul-14	5,654	6,629,590	49,077.00	57,221,259	0.00086
Aug-14	4,952	5,631,491	50,041.00	57,525,137	0.00087
Sep-14	5,035	6,128,968	50,013.00	58,352,017	0.00086
Oct-14	5,653	6,436,946	53,733.00	61,959,361	0.00087
Nov-14	1,008	1,166,445	53,356.00	61,440,352	0.00087
Dec-14	3,082	3,595,363	52,907.00	61,282,609	0.00086
Jan-15	5,414	5,840,806	54,920.43	63,087,791	0.00087
Feb-15	4,485	5,432,403	54,532.43	63,305,235	0.00086
Mar-15	4,483	5,455,086	53,995.43	62,801,721	0.00086
Apr-15	5,522	6,155,533	54,786.43	63,818,777	0.00086

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

DEC 18 2015

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7009 2820 0001 8284 2085

Lori Sanders
Environmental Attorney
E.I. du Pont de Nemours and Company
1007 N Market St. D-7086
Wilmington, DE 19898

RE: DuPont Pontchartrain Works Facility – LaPlace, LA
Clean Air Act Section 114 Information Request

Dear Ms. Sanders:

Enclosed is an Information Request (Request) issued E.I. du Pont de Nemours and Company under the authority of Section 114 of the Clean Air Act (CAA). The purpose of this Request is to obtain information necessary to determine whether the DuPont Pontchartrain Works Facility – LaPlace, LA is in compliance with the provisions of the CAA.

Please provide the information requested within thirty (30) days of your receipt of this letter to James Leathers, at the above address. If you have any questions, need to request an extension, or wish to schedule a meeting to discuss this Request, please contact Justin Lannen, Attorney, at 214-665-8130.

Sincerely,

John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosures

CC:
Celena Cage, LDEQ

ENCLOSURE A

INFORMATION REQUEST

The U.S. Environmental Protection Agency (EPA) Region 6 is issuing this request for information to E.I. du Pont de Nemours and Company (DuPont) pursuant to Section 114(a) of the Clean Air Act (CAA) 42 U.S.C. § 7414(a) for the purpose of determining compliance with the CAA. Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement Division, EPA Region 6. Therefore, DuPont is required to provide a response to this Request regarding the DuPont Pontchartrain Works facility located in LaPlace, Louisiana (the "Facility").

The information requested must be submitted whether or not you regard part or all of it a trade secret or confidential business information. You may, if you desire, assert a business confidentiality claim on all or part of the information submitted. Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. § 1905. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of a claim. Emission data is exempt from claims of confidentiality under Section 114 of the Act, and the emissions data that you provide may be made available to the public. Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B. Failure to assert a business confidentiality claim makes all submitted information available to the public without further notice.

We request that a duly authorized officer or agent of the Facility certify your response by signing the following certification:

> I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

If information responsive to this request was previously provided to EPA subsequent to a recent EPA Air Compliance Inspection or in response to a previous Information Request, EPA does not require that such information be submitted again. In lieu of resubmitting such information, please indicate which information was already provided, the date that the information was submitted to EPA and to whom it was provided.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

All information responsive to this request should be sent to the following:

James Leathers
Toxics Enforcement Section 6EN-AT
Compliance Assurance and Enforcement Division
U.S. EPA - Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Please be advised that some companies may qualify as a "small business" under the Small Business Regulatory Enforcement and Fairness Act (SBREFA). To help small business owners assess their small business status, the U.S. Small Business Administration (SBA) has established a Table of Small Business Size Standards, which can be found at: http://www.sba.gov/sites/default/files/Size_Standards_Table.pdf. If DuPont qualifies as a small business, please review the SBREFA Information Sheet designed to provide information on compliance assistance to entities that may qualify as small businesses as well as to inform them of their right to comment to the SBREFA Ombudsman concerning EPA enforcement activities. The SBREFA Information Sheet can be found at: http://nepis.epa.gov/Exe/ZyPDF.cgi/P100BYAV.PDF?Dockey=P100BYAV.PDF. Please be aware that SBREFA does not eliminate DuPont's responsibility to respond in a timely fashion to any complaint or information request that EPA may issue or other enforcement action that EPA may take, nor does SBREFA create any new rights or defenses under the law other than the right to comment to the SBREFA Ombudsman. If you are unable to access the links provided or need a hard copy, please contact James Leathers at the phone number listed in the cover letter transmitted with this Request.

This request is not subject to the Paperwork Reduction Act, 44 U.S. C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Please be advised that under Section 113(a) of the Act, failure to provide the information required by this letter in a timely manner may result in an order requiring compliance, an order assessing an administrative penalty, or a civil action for appropriate relief. In addition, Section 113(c) of the Act provides criminal penalties for knowingly making any false statements or omission in any response required under the Act. EPA may also seek criminal penalties from any person who knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of EPA or in relation to or contemplation of any such matter or case. *See* 18 U.S.C. § 1519 (2004). The information provided by you may be used by the United States in administrative, civil, or criminal proceedings.

I. GENERAL INSTRUCTIONS

1. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.

2. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.

3. Please provide a separate response to each question and subpart of a question set forth in this Request and precede each answer with the number of the question to which it corresponds.

4. For each question, identify each person responding to any question contained in this Request on your behalf, as well as each person consulted in the preparation of a response.

5. If available, provide copies of documents in searchable electronic format (*e.g.*, pdf) rather than hard copies. If hard copies of documents are provided, please submit all information for each question in a logically sequenced, bound format.

6. Data should be provided in searchable and editable electronic format (*e.g.*, spreadsheet).

7. When a response is provided in the form of a number, specify the units of measure.

8. Confidential business information (CBI) and non-confidential information should be submitted on separate media devices and identified as such. Please mark each page that is confidential business information as such. To make a CBI claim on hard copy documents, mark each page that is claimed, by cover sheet, stamp, or other suitable form of notice with language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and submitted separately to facilitate identification and handling by EPA. The assertion and substantiation requirements for CBI claims are discussed in a subsequent section of this document.

9. Indicate the assigned facility-wide federal air program (*e.g.*, AFS) and state (*e.g.*, Agency Interest, Regulated Entity) identification numbers for the subject facility.

10. For each media device (*e.g.*, compact disc, flash drive) containing electronic documents, provide a table of contents so that each document can be accurately identified in relation to your response to a specific question. In addition, each media device should be labeled (*e.g.*, company name, Disc 1 of 4 for information request response, date of response).

11. For each question, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific question. Indicate on each document produced in response to this Information Request the number of the question to which it corresponds.

12. If DuPont has no responsive information or documents for a particular question, submit a statement certifying this, along with a detailed explanation. If a document is responsive to more than one question, this must be so indicated, and only one copy of the document need be provided.

II. DEFINITIONS

The following definitions shall apply to the following words as they appear in Enclosure A:

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, draft or final, whether or not wholly or partially in handwriting, including documentation solely in electronic form, including by way of illustration and not by way of imitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations, including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, email, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.

2. The term E.I. du Pont de Nemours and Company (DuPont) includes any officer, director, agent, or employee of E.I. du Pont de Nemours and Company, including any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof.

3. The terms "person" or "persons" shall have the meaning set forth in Section 302(e) of the Act, 42 U.S.C. § 7602(e), and includes an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent or employee thereof.

4. The terms "you" or "yours", as used in each of the questions set forth in the attached Section 114 letter, refers to, and shall mean, the company or corporation with which each addressee of the attached Section 114 letter is affiliated, including its subsidiaries, division, affiliates, predecessors, successors, assigns, and its former and present officers, directors, agents, employees, representatives, attorneys, consultants, accountants and all other persons acting on its behalf.

5. The "Facility" is the synthetic rubber manufacturing plant formerly owned and/or operated by DuPont and located in LaPlace, Louisiana.

6. All terms used in the Information Request will have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. § 7401 et seq., the implementing regulations, or 40 C.F.R. Part 68.

7. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

III. QUESTIONS

E.I. du Pont de Nemours and Company shall submit the following information about its elastomers facility, Pontchartrain Works, located in Laplace, Louisiana, within 30 days:

The Facility contains emission units that emit or have the potential to emit pollutants that are subject to requirements of the Clean Air Act (CAA). Accordingly, you must provide the following information available to you that relates to the Pontchartrain Works elastomers facility:

1. A scaled site plot plan drawing of the Facility and the area immediately surrounding the Facility. The plot plan should include the Chloroprene Unit, Permit No. 3000-V5, the Neoprene Unit, Permit No. 2249-V7, and the HCl Recovery Unit, Permit No. 206-V2, and containing the following:
    a. Property lines on all sides, true north arrow orientation, and showing immediately adjacent streets or property names;

b. Buildings, structures, significant features, and equipment areas on the plant property, with labels or a legend identifying each building, structure, feature, or area; and
c. Labels or a legend identifying the locations and names of all air emission sources that emit **chloroprene** at the Facility, consistent with permit ID Number designations and names found in the Facility's above-referenced Title V air permits.

2. Provide up-to-date detailed process flow diagrams for all production processes and affected auxiliary support operations at the Facility (*e.g.*, wastewater treatment, loading/unloading, etc.), where chloroprene is an emitted pollutant. For each production process flow diagram provided, specify on the diagram if the process operates as a batch process or a continuous process and include on the diagram any combined vent streams from other processes. On the diagrams, using a key for clarity purposes, identify each of the units identified in response to question #1. The diagram must include all emissions units, continuous emissions monitoring systems ("CEMS"), continuous opacity monitoring systems ("COMS"), and all Air Pollution Control Equipment ("APCE"), labeled in a manner consistent with the Facility's LDEQ Air Permits.

3. Provide complete copies of air dispersion modeling studies or reports completed during calendar years 2011 through 2015, for air permitting or other emissions authorization, risk management plans, disaster prevention and release response planning, or episodic release reporting. Include as electronic attachments any emission source modeling spreadsheets developed and employed, plus input and output files in their native format from the modeling software or program used. In addition, please include the meteorological site location and the meteorological data utilized for the air dispersion modeling.

4. Provide all emission calculations of chloroprene that were prepared for LDEQ air permit applications and emission inventories in calendar years 2011 through 2015, including references or bases for emission factors and calculation methodologies used.

5. For any emission point where chloroprene is a pollutant, please list occurrences where the reported emission value to the emission inventory is within 2% of the permitted allowable or the previous year's emissions inventory submittal. For these occurrences, provide an explanation of why the values are so similar (*e.g.*, is the previous years reported emissions used to estimate the future emission, does the methodology used to estimate emissions leave no room for inaccuracy, etc.).

6. Provide all usage threshold determinations and air release calculations for chloroprene from Toxic Chemical Release Inventory (TRI) reports for calendar years 2010 through 2014, including references or bases for estimating air releases, including estimation and calculation methodologies used.

7. Provide all measurements, engineering assessments, and calculations performed to determine the most recent Total Resource Effectiveness index value (TRE index value[1]) for any applicable MACT standard. Include any data, assumptions, and procedures used for the engineering assessments.

8. Provide the most recent performance testing records required by the above referenced Title V air permits (Chloroprene Unit, Permit No. 3000-V5, the Neoprene Unit, Permit No. 2249-V7, and the HCl Recovery Unit, Permit No. 206-V2).

9. Provide the most recent submittal of any notification of compliance status used to comply with any applicable MACT standards. If any Emissions Averaging provisions apply as a MACT compliance option, provide the emissions averaging plan with any updates.

[1] As defined in §63.111: Total resource effectiveness index value or TRE index value means a measure of the supplemental total resource requirement per unit reduction of organic HAP associated with a process vent stream, based on vent stream flow rate, emission rate of organic HAP, net heating value, and corrosion properties (whether or not the vent stream contains halogenated compounds), as quantified by the equations given under §63.115 of this subpart.

CONFIDENTIAL BUSINESS INFORMATION (CBI) CLAIM ASSERTION & SUBSTANTIATION REQUIREMENTS

Assertion - You may assert a business confidentiality claim covering all or part of the information requested in response to this Request, as provided in 40 C.F.R. § 2.203(b). You may assert a business confidentiality claim covering such information by placing on (or attaching to) the information you desire to assert a confidentiality claim, at the time it is submitted to EPA, a cover sheet, stamped, or typed legend (or other suitable form of notice) employing language such as 'trade secret,' 'proprietary,' or 'company confidential.' Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and submitted separately to facilitate identification and handling by EPA. If confidential treatment is desired up until a certain date or until the occurrence of a certain event, the notice should state this. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Clean Air Act (CAA) and 40 C.F.R. Part 2.

EPA will construe the failure to furnish a CBI claim with your response to this Request as a waiver of that claim, and the information may be made available to the public without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a confidentiality claim, since certain categories of information are not properly the subject of a claim. Emission data is exempt from claims of confidentiality under Section 114 of the CAA. Any emissions data you provide may be made available to the public. Information subject to a confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B.

Substantiation - All confidentiality claims are subject to EPA verification in accordance with 40 C.F.R. Part 2, Subpart B. The criteria for determining whether material claimed as confidential is entitled to such treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301, which provide, in part, that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and you intend to continue to do so; the information is not and has not been reasonably obtainable by legitimate means without your consent; and the disclosure of the information is likely to cause substantial harm to your business's competitive edge.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter (separate from this Request) asking you to substantiate your CBI claim. If you receive such a letter, you must provide EPA with a response within the time frame set forth in the letter. Failure to submit a response within that time would be regarded as a waiver of your claim, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider CBI. You must be specific by page, paragraph, and sentence when identifying the information subject to your claim. Any information not specifically identified as subject to a CBI claim may be disclosed without further notice to you. If you receive such a letter, for each item or class of information that you identify as being subject, you must answer the questions below, giving as much detail as possible, in accordance with 40 C.F.R. § 2.204(e):

1. What specific portions of the information do you allege to be entitled to confidential treatment? For what period of time do you request that the information be maintained as confidential, *e.g.*, until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of an event will eliminate the need for confidentiality, please specify the event.

2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?

3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by agreement not to disclose it? If so, why should the information be considered CBI?

4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

6. For each category of information claimed as confidential, <u>explain with specificity</u> why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.

8. Any other issue you deem relevant.

Please note emission data is not entitled to confidential treatment under 40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C). 'Emission data' means, with reference to any source of emission of any substance into the air: (A) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by source), or any combination of the foregoing; (B) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of source

operation); and (C) A general description of location and nature of source to extent necessary to identify and distinguish from other sources (including, as necessary for such purposes, a description of the device, installation, or operation constituting the source).

If you receive a substantiation request letter from EPA, you bear the burden of substantiating your CBI claim. Conclusory allegations will be given little or no weight in the determination. If you fail to make a CBI claim with the response to this Request, the information may be released without further notice to you. Failure to give a timely response to a separate substantiation request letter is regarded as a waiver of any CBI claim, and EPA may release the information.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

DEC 18 2015

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7009 2820 0001 8284 2054

Jorge Lavastida
Executive Officer and Plant Manager
Denka Performance Elastomers LLC
586 Highway 44
Laplace, LA 70068

RE: Denka Performance Elastomers LLC
Clean Air Act Section 114 Information Request

Dear Mr. Lavastida:

Enclosed is an Information Request (Request) issued to Denka Performance Elastomers LLC under the authority of Section 114 of the Clean Air Act (CAA). The purpose of this Request is to obtain information necessary to determine whether the Denka Performance Elastomers LLC facility is in compliance with the provisions of the CAA.

Please provide the information requested within thirty (30) days of your receipt of this letter to James Leathers, at the above address. If you have any questions, need to request an extension, or wish to schedule a meeting to discuss this Request, please contact Justin Lannen, Attorney, at 214-665-8130.

Sincerely,

John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosures

CC:
Celena Cage, LDEQ

ENCLOSURE A

INFORMATION REQUEST

The U.S. Environmental Protection Agency (EPA) Region 6 is issuing this request for information to Denka Performance Elastomer LLC (Denka) pursuant to Section 114(a) of the Clean Air Act (CAA) 42 U.S.C. § 7414(a) for the purpose of determining compliance with the CAA. Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement Division, EPA Region 6. Therefore, Denka is required to provide a response to this Request regarding the Denka Performance Elastomer LLC facility located in LaPlace, Louisiana (the "Facility").

The information requested must be submitted whether or not you regard part or all of it a trade secret or confidential business information. You may, if you desire, assert a business confidentiality claim on all or part of the information submitted. Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. § 1905. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of a claim. Emission data is exempt from claims of confidentiality under Section 114 of the Act, and the emissions data that you provide may be made available to the public. Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B. Failure to assert a business confidentiality claim makes all submitted information available to the public without further notice.

We request that a duly authorized officer or agent of the Facility certify your response by signing the following certification:

> I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

If information responsive to this request was previously provided to EPA subsequent to a recent EPA Air Compliance Inspection or in response to a previous Information Request, EPA does not require that such information be submitted again. In lieu of resubmitting such information, please indicate which information was already provided, the date that the information was submitted to EPA and to whom it was provided.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

All information responsive to this request should be sent to the following:

James Leathers
Toxics Enforcement Section 6EN-AT
Compliance Assurance and Enforcement Division
U.S. EPA - Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Please be advised that some companies may qualify as a "small business" under the Small Business Regulatory Enforcement and Fairness Act (SBREFA). To help small business owners assess their small business status, the U.S. Small Business Administration (SBA) has established a Table of Small Business Size Standards, which can be found at: http://www.sba.gov/sites/default/files/Size_Standards_Table.pdf. If Denka qualifies as a small business, please review the SBREFA Information Sheet designed to provide information on compliance assistance to entities that may qualify as small businesses as well as to inform them of their right to comment to the SBREFA Ombudsman concerning EPA enforcement activities. The SBREFA Information Sheet can be found at:
http://nepis.epa.gov/Exe/ZyPDF.cgi/P100BYAV.PDF?Dockey=P100BYAV.PDF. Please be aware that SBREFA does not eliminate Denka's responsibility to respond in a timely fashion to any complaint or information request that EPA may issue or other enforcement action that EPA may take, nor does SBREFA create any new rights or defenses under the law other than the right to comment to the SBREFA Ombudsman. If you are unable to access the links provided or need a hard copy, please contact James Leathers at the phone number listed in the cover letter transmitted with this Request.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Please be advised that under Section 113(a) of the Act, failure to provide the information required by this letter in a timely manner may result in an order requiring compliance, an order assessing an administrative penalty, or a civil action for appropriate relief. In addition, Section 113(c) of the Act provides criminal penalties for knowingly making any false statements or omission in any response required under the Act. EPA may also seek criminal penalties from any person who knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of EPA or in relation to or contemplation of any such matter or case. *See* 18 U.S.C. § 1519 (2004). The information provided by you may be used by the United States in administrative, civil, or criminal proceedings.

I. GENERAL INSTRUCTIONS

1. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.

2. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.

3. Please provide a separate response to each question and subpart of a question set forth in this Request and precede each answer with the number of the question to which it corresponds.

4. For each question, identify each person responding to any question contained in this Request on your behalf, as well as each person consulted in the preparation of a response.

5. If available, provide copies of documents in searchable electronic format (*e.g.*, pdf) rather than hard copies. If hard copies of documents are provided, please submit all information for each question in a logically sequenced, bound format.

6. Data should be provided in searchable and editable electronic format (*e.g.*, spreadsheet).

7. When a response is provided in the form of a number, specify the units of measure.

8. Confidential business information (CBI) and non-confidential information should be submitted on separate media devices and identified as such. Please mark each page that is confidential business information as such. To make a CBI claim on hard copy documents, mark each page that is claimed, by cover sheet, stamp, or other suitable form of notice with language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and submitted separately to facilitate identification and handling by EPA. The assertion and substantiation requirements for CBI claims are discussed in a subsequent section of this document.

9. Indicate the assigned facility-wide federal air program (*e.g.*, AFS) and state (*e.g.*, Agency Interest, Regulated Entity) identification numbers for the subject facility.

10. For each media device (*e.g.*, compact disc, flash drive) containing electronic documents, provide a table of contents so that each document can be accurately identified in relation to your response to a specific question. In addition, each media device should be labeled (*e.g.*, company name, Disc 1 of 4 for information request response, date of response).

11. For each question, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific question. Indicate on each document produced in response to this Information Request the number of the question to which it corresponds.

12. If Denka has no responsive information or documents for a particular question, submit a statement certifying this, along with a detailed explanation. If a document is responsive to more than one question, this must be so indicated, and only one copy of the document need be provided.

II. DEFINITIONS

The following definitions shall apply to the following words as they appear in Enclosure A:

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, draft or final, whether or not wholly or partially in handwriting, including documentation solely in electronic form, including by way of illustration and not by way of imitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations, including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, email, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.

2. The term Denka Performance Elastomer LLC (Denka) includes any officer, director, agent, or employee of Denka Performance Elastomer LLC, including any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof.

3. The terms "person" or "persons" shall have the meaning set forth in Section 302(e) of the Act, 42 U.S.C. § 7602(e), and includes an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent or employee thereof.

4. The terms "you" or "yours", as used in each of the questions set forth in the attached Section 114 letter, refers to, and shall mean, the company or corporation with which each addressee of the attached Section 114 letter is affiliated, including its subsidiaries, division, affiliates, predecessors, successors, assigns, and its former and present officers, directors, agents, employees, representatives, attorneys, consultants, accountants and all other persons acting on its behalf.

5. The "Facility" is the synthetic rubber manufacturing plant owned and/or operated by Denka and located in LaPlace, Louisiana.

6. All terms used in the Information Request will have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. § 7401 et seq., the implementing regulations, or 40 C.F.R. Part 68.

7. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

III. QUESTIONS

Denka Performance Elastomer LLC shall submit the following information about its elastomers facility located in Laplace, Louisiana, within 30 days:

The Facility contains emission units that emit, or have the potential to emit, pollutants that are subject to requirements of the Clean Air Act (CAA). Accordingly, you must provide the following information available to you that relates to the Denka Performance Elastomer Facility:

1. A scaled site plot plan drawing of the Facility and the area immediately surrounding the Facility. The plot plan should include the Chloroprene Unit, Permit No. 3000-V5, the Neoprene Unit, Permit No. 2249-V7, and the HCl Recovery Unit, Permit No. 206-V2, and containing the following:
    a. Property lines on all sides, true north arrow orientation, and showing immediately adjacent streets or property names;

b. Buildings, structures, significant features, and equipment areas on the plant property, with labels or a legend identifying each building, structure, feature, or area; and
c. Labels or a legend identifying the locations and names of all air emission sources that emit **chloroprene** at the Facility, consistent with permit ID Number designations and names found in the Facility's above-referenced Title V air permits.

2. Provide up-to-date detailed process flow diagrams for all production processes and affected auxiliary support operations at the Facility (*e.g.*, wastewater treatment, loading/unloading, etc.), where chloroprene is an emitted pollutant. For each production process flow diagram provided, specify on the diagram if the process operates as a batch process or a continuous process and include on the diagram any combined vent streams from other processes. On the diagrams, using a key for clarity purposes, identify each of the units identified in response to question #1. The diagram must include all emissions units, continuous emissions monitoring systems ("CEMS"), continuous opacity monitoring systems ("COMS"), and all Air Pollution Control Equipment ("APCE"), labeled in a manner consistent with the Facility's LDEQ Air Permits.

3. Provide complete copies of air dispersion modeling studies or reports completed during calendar years 2011 through 2015, for air permitting or other emissions authorization, risk management plans, disaster prevention and release response planning, or episodic release reporting. Include as electronic attachments any emission source modeling spreadsheets developed and employed, plus input and output files in their native format from the modeling software or program used. In addition, please include the meteorological site location and the meteorological data utilized for the air dispersion modeling.

4. Provide all emission calculations of chloroprene that were prepared for LDEQ air permit applications and emission inventories in calendar years 2011 through 2015, including references or bases for emission factors and calculation methodologies used.

5. For any emission point where chloroprene is a pollutant, please list occurrences where the reported emission value to the emission inventory is within 2% of the permitted allowable or the previous year's emissions inventory submittal. For these occurrences, provide an explanation of why the values are so similar (*e.g.*, is the previous year's reported emissions used to estimate the future emissions, does the methodology used to estimate emissions leave no room for inaccuracy, etc.).

6. Provide all usage threshold determinations and air release calculations for chloroprene from Toxic Chemical Release Inventory (TRI) reports for calendar years 2010 through 2014, including references or bases for estimating air releases, including estimation and calculation methodologies used.

7. Provide all measurements, engineering assessments, and calculations performed to determine the most recent Total Resource Effectiveness index value (TRE index value[1]) for any applicable MACT standard. Include any data, assumptions, and procedures used for the engineering assessments.

8. Provide the most recent performance testing records required by the above referenced Title V air permits (Chloroprene Unit, Permit No. 3000-V5, the Neoprene Unit, Permit No. 2249-V7, and the HCl Recovery Unit, Permit No. 206-V2).

9. Provide the most recent submittal of any notification of compliance status used to comply with any applicable MACT standards. If any Emissions Averaging provisions apply as a MACT compliance option, provide the emissions averaging plan with any updates.

[1] As defined in 40 C.F.R. § 63.111: Total resource effectiveness index value or TRE index value means a measure of the supplemental total resource requirement per unit reduction of organic HAP associated with a process vent stream, based on vent stream flow rate, emission rate of organic HAP, net heating value, and corrosion properties (whether or not the vent stream contains halogenated compounds), as quantified by the equations given under § 63.115 of this subpart.

CONFIDENTIAL BUSINESS INFORMATION (CBI) CLAIM ASSERTION & SUBSTANTIATION REQUIREMENTS

Assertion - You may assert a business confidentiality claim covering all or part of the information requested in response to this Request, as provided in 40 C.F.R. § 2.203(b). You may assert a business confidentiality claim covering such information by placing on (or attaching to) the information you desire to assert a confidentiality claim, at the time it is submitted to EPA, a cover sheet, stamped, or typed legend (or other suitable form of notice) employing language such as 'trade secret,' 'proprietary,' or 'company confidential.' Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and submitted separately to facilitate identification and handling by EPA. If confidential treatment is desired up until a certain date or until the occurrence of a certain event, the notice should state this. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Clean Air Act (CAA) and 40 C.F.R. Part 2.

EPA will construe the failure to furnish a CBI claim with your response to this Request as a waiver of that claim, and the information may be made available to the public without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a confidentiality claim, since certain categories of information are not properly the subject of a claim. Emission data is exempt from claims of confidentiality under Section 114 of the CAA. Any emissions data you provide may be made available to the public. Information subject to a confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B.

Substantiation - All confidentiality claims are subject to EPA verification in accordance with 40 C.F.R. Part 2, Subpart B. The criteria for determining whether material claimed as confidential is entitled to such treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301, which provide, in part, that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and you intend to continue to do so; the information is not and has not been reasonably obtainable by legitimate means without your consent; and the disclosure of the information is likely to cause substantial harm to your business's competitive edge.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter (separate from this Request) asking you to substantiate your CBI claim. If you receive such a letter, you must provide EPA with a response within the time frame set forth in the letter. Failure to submit a response within that time would be regarded as a waiver of your claim, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider CBI. You must be specific by page, paragraph, and sentence when identifying the information subject to your claim. Any information not specifically identified as subject to a CBI claim may be disclosed without further notice to you. If you receive such a letter, for each item or class of information that you identify as being subject, you must answer the questions below, giving as much detail as possible, in accordance with 40 C.F.R. § 2.204(e):

1. What specific portions of the information do you allege to be entitled to confidential treatment? For what period of time do you request that the information be maintained as confidential, *e.g.*, until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of an event will eliminate the need for confidentiality, please specify the event.

2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?

3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by agreement not to disclose it? If so, why should the information be considered CBI?

4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

6. For each category of information claimed as confidential, <u>explain with specificity</u> why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.

8. Any other issue you deem relevant.

Please note emission data is not entitled to confidential treatment under 40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C). 'Emission data' means, with reference to any source of emission of any substance into the air: (A) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by source), or any combination of the foregoing; (B) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of source

operation); and (C) A general description of location and nature of source to extent necessary to identify and distinguish from other sources (including, as necessary for such purposes, a description of the device, installation, or operation constituting the source).

If you receive a substantiation request letter from EPA, you bear the burden of substantiating your CBI claim. Conclusory allegations will be given little or no weight in the determination. If you fail to make a CBI claim with the response to this Request, the information may be released without further notice to you. Failure to give a timely response to a separate substantiation request letter is regarded as a waiver of any CBI claim, and EPA may release the information.

11 0000 597131

RECEIVED
US EPA, DALLAS, TX
ASSOCIATE DIRECTOR

16 FEB 17 AM 10: 47

COMPLIANCE ASSURANCE
& ENFORCEMENT DIV.

A1/A1/CO

The miracles of science

DuPont Pontchartrain Site
586 Highway 44
LaPlace, LA 70068

February 11, 2016

CERTIFIED MAIL NO. 7012 1010 0000 0195 4928

Dept. of Environmental Quality
Office of Compliance
P. O. Box 4312
Baton Rouge, La 70821-4312

Re: DuPont Pontchartrain Site Semi-Annual Fugitive Emissions Consolidated Source Agreement Periodic Report (LDEQ Agency Interest Numbers 1101 & 38806)

As required in accordance with the Fugitive Emissions Consolidated Source Agreement dated November 18, 2013, and Letter of Response dated December 20, 2013, enclosed is the Periodic Report for the DuPont Pontchartrain Site located in LaPlace, Louisiana. This Periodic Report includes the reporting requirements for the semi-annual (second half of 2015) period of July 1, 2015 through December 31, 2015.

According to the Fugitive Emissions Consolidated Source Agreement, which was effective January 1, 2014, the entire DuPont Pontchartrain Site will comply with the HON (40 CFR Subpart H) as the most stringent and guiding fugitive rule. The reporting requirements were also consolidated with this Agreement and the Fugitive Emissions Consolidated Source Agreement Periodic Report as enclosed is being submitted in accordance with 40 CFR Subpart H (40 CFR 63.182.d). The Fugitive Emissions Consolidated Source Agreement Periodic Report will be the only fugitive periodic report submitted since it fulfills all other fugitive program reporting requirements. Previously, the facility submitted multiple periodic reports for differing time periods for each process unit according to various applicable reporting requirements. Previous reports included Subpart H-HON, Subpart FFFF, Subpart U-P & R I, and LAC 33:III.2121 periodic reports for the ACR, Chloroprene, Neoprene, Diamines, and HCL Recovery Units if applicable to those rules. Also to note, since HON Subpart H is now the governing rule for all of the components on-site, the data within the Periodic Report has been consolidated and summarized. In other words, process unit data is not listed independently, but is listed as part of the DuPont Pontchartrain Site's data within the Periodic Report.

Effective November 1, 2015, the ACR, Chloroprene, Neoprene, and HCL Recovery Units were sold by DuPont to Denka Performance Elastomers (Denka). As of this effective date, DuPont will no longer report fugitive data for the production units owned by Denka and will only be reporting fugitive data for the Diamines Unit (LDEQ Agency Interest No. 1101) within DuPont's *Semi-Annual Fugitive Emissions Consolidated Source Report*.

If you have any questions or need any additional information, please contact me at (985) 536-5438 or at Anthony.J.Fugarino@dupont.com.

Sincerely,

Anthony Fugarino

Anthony Fugarino
SHE Consultant

Enclosures

cc: CERTIFIED MAIL NO. 7012 1010 0000 0195 4935
US EPA Region 6
Routine Air Compliance Report Submission
Compliance and Enforcement Division
Mail Number: 6EN-AA
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

FUGITIVE EMISSIONS CONSOLIDATED SOURCE AGREEMENT PERIODIC REPORT
DuPont Pontchartrain Site
July 1, 2015 through December 31, 2015

1. NAME OF FACILITY: DuPont Pontchartrain Site

PROCESS UNITS: All on-site units (Chloroprene, ACR, Neoprene, HCL Recovery, and Diamines Manufacturing Units) per Fugitive Emissions Consolidated Source Agreement until October 31, 2015. On November 1, 2015 DuPont no longer owns the Chloroprene, ACR, Neoprene, and HCL Recovery Units. As of this date, DuPont only owns the Diamines Unit and going forward from this date DuPont will only report fugitive data for the Diamines Unit.

2. SUMMARY INFORMATION
[40 CFR §63.182 (d)(2)]

		2015 THIRD QUARTER	2015 FOURTH QUARTER
(i)	No. valves found leaking	2	0
	Percent valves leaking	0.04	0
	Total no. monitored	4,712	1,101
(ii)	No. leaking valves not repaired	0	0
	No. valves not Repairable	0	0

		2015 JUL	AUG	SEP	OCT	NOV	DEC
(iii)	No. pumps leaking §63.163 (P_L)	0	0	0	0	0	0
	Total no. pumps leaking §63.182(d)(2)(iii)	2	0	0	1	0	0
	Percent leaking pumps (%P_L) (Includes "P_L" leaks only)	0	0	0	0	0	0
	Total no. monitored	141	141	141	141	5	5
(iv)	No. leaking pumps not repaired	0	0	0	0	0	0
(v)	No. compressors found leaking	0	0	0	0	0	0
(vi)	No. leaking compressors No repaired	0	0	0	0	0	0
(vii)	No. agitators found leaking	0	0	0	0	0	0
(viii)	No. leaking agitators not repaired	0	0	0	0	0	0

2. SUMMARY INFORMATION (cont.)
[40 CFR §63.182 (d)(2)]

		2015	
		THIRD QUARTER	FOURTH QUARTER
(ix)	No. leaking connectors	0	0
	Percent connectors leaking	0	0
	Total no. monitored	6,118	0
(x)	Reserved		
(xi)	No. leaking connectors not repaired	0	0
	No. connectors not repairable	0	0
(xii)	Reserved		

(xiii) Explain delay of repairs, if any, and why process unit shutdown was technically infeasible, if appropriate. The table below summarizes all components that were found leaking and had their repair delayed during this reporting period. Components that cannot be repaired without a process unit shutdown will be repaired during the next process unit shutdown. "Shutdown – delay of repair" components were delayed because we were not able to bypass or isolate them for repair. A process unit shutdown is required to repair these components in a safe, responsible manner. Components that have been isolated will be repaired before returning to service.

Unit	Chemical State	ID/Tag Number	Type of Component	Delay of Repair Reason
Diamines	Heavy Liquid	50811039	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50810995	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50811021	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50811026	Pump	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50909467-1	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50809467-2	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50809474	Connector	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50813302	Connector	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50808323	Connector	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50811028	Pump	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50806758	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50808803	Pump	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50807261	Pump	Isolated & not in VOC Service
Diamines	Heavy Liquid	50811015	Instrumentation System	Isolated & not in VOC Service
Diamines	Heavy Liquid	50812038	Instrumentation System	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50813303	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50811013	Valve	Repair infeasible w/o shutdown
Diamines	Heavy Liquid	50811948	Valve	Repair infeasible w/o shutdown

All components summarized in the table above were discovered leaking through sensory methods.

2. SUMMARY INFORMATION (cont.)
[40 CFR §63.182 (d)(2)]

(xiv) Results of monitoring to comply with:

63.164 (i) – The Pontchartrain Site monitors compressors monthly instead of annually. Compressor monitoring results are summarized above in sections v and vi of this periodic report. No compressors were found leaking during this period as a result of this monitoring.

63.165 (a) – Gas/vapor service pressure relief devices are monitored once a month to insure they operate below the 500 ppm limit. No gas/vapor service pressure relief devices were found leaking during this period as a result of this monitoring.

63.172 (f) – Annual Closed Vent Visual Inspections were conducted in the third quarter of 2015, which is the previous semi-annual reporting period. No leaks were found during these visual inspections.

(xv) Not applicable

(xvi) Connectors Monitoring Alternatives – Since the implementation of the fugitive emission program the Pontchartrain Site has used the monitoring alternative described under 63.174(c)(1)(ii).

(xvii) Not applicable

3. CONSOLIDATED SOURCE AGREEMENT REQUIREMENT

Summary of all monitoring performed within the Reporting Period at the Pontchartrain Site

Equipment Category	Number of Components Monitored
Connector	6,118
Valve	5,813
Pump	578
Compressor	4
Instrumentation system	374
Agitator	88
Pressure relief device	421
Non-regulated components	441

Note: non-regulated components include components not in contact with LDAR regulated process streams or component types not specific to LDAR regulations, such as combustion chamber seals.

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ASSOCIATE DIRECTOR
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COMPLIANCE ASSURANCE
& ENFORCEMENT DIV.

Denka
Denka Performance Elastomer

Denka Performance Elastomer LLC
560 Highway 44
LaPlace, LA 70068

A1/A1/CO

January 26, 2016

La. Dept. of Environmental Quality
Office of Enforcement and Compliance
P. O. Box 4312
Baton Rouge, LA 70821-4312

CERTIFIED MAIL NO. 7011 3500 0001 6350 1599

Re: Denka Performance Elastomer LLC – Pontchartrain Site – AI#199310
40 CFR Part 63, Subpart FFFF
Periodic Report – ACR Unit

On November 1, 2015 Denka Performance Elastomer LLC (DPE) acquired ownership and operation of the DuPont Neoprene Manufacturing Unit located in LaPlace, LA. As required under 40 CFR Part 63, Subpart FFFF, MON MACT regulation, DPE is submitting this periodic report for the period of November 1 to December 31, 2015.

If you have any questions or comments, you can contact me at 985-536-7596 or at doris-b-grego@denka-pe.com.

Sincerely,

Doris B. Grego

Doris B. Grego, P.E.
SHE Senior Consultant

cc: U.S. EPA Region 6,
Air Enforcement Section
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733
CERTIFIED MAIL NO. 7011 3500 0001 6350 1605

DENKA PERFORMANCE ELASTOMER LLC - ACR UNIT

PONTCHARTRAIN SITE, LAPLACE, LOUISIANA

TITLE V OPERATING PERMITS: 2249-V8 AND 3000-V5

40 CFR PART 63, SUBPART FFFF – PERIODIC REPORT

STARTING DATE: NOVEMBER 1, 2015

ENDING DATE: DECEMBER 31, 2015

CERTIFICATION STATEMENT

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate and complete.

Responsible Official's Name	Jorge Lavastida
Responsible Official's Title	Plant Manager
Signature	
Date Signed	1-26-16

Denka Performance Elastomer - ACR Unit
Pontchartrain Site, LaPlace, Louisiana
40 CFR Part 63, Subpart FFFF, §63.2520(e)
Periodic Report

40 CFR §63.2520(e)(1) Company Name and Address

Denka Performance Elastomer LLC
560 Highway 44
LaPlace, La. 70068
Contact – Doris B. Grego
Phone – 985-536-7596
e-mail – doris-b-grego@denka-pe.com

40 CFR §63.2520(e)(2) Statement by Responsible Official

Included with this submittal.

40 CFR §63.2520(e)(3) Reporting Period

Reporting period beginning on November 1, 2015 and ending on December 31, 2015.

40 CFR §63.2520(e)(4) SSM Malfunctions

There were no SSM in which excess emissions occurred during this reporting period.

40 CFR §63.2520(e)(5) Deviations

No deviations from the permitted limits or permit conditions were experienced during this reporting period.

40 CFR §63.2520(e)(6) CEMS

This facility is not required to have CEMs.

40 CFR §63.2520(e)(7) Operating Scenarios

There were no new operating scenarios since the notification of compliance status was submitted.

40 CFR §63.2520(e)(8) Process Unit Groups

No new process units were added to this facility.

40 CFR §63.2520(e)(9) Other Records

Heat Exchange Systems (63.104(f)(2): This facility does not have heat exchange systems that meet this definition.

Wastewater (63.146(c), (d) and (e): This facility does not have wastewater streams which contain listed HAPs.

Equipment Leaks: If complying with Subpart H, submit the information listed in §63.182(d). If complying with Subpart UU, submit the information listed in §63.1039(b).

This facility has selected to comply with Subpart H; LDAR reports are submitted separately.

Closed Vent Systems and Control Devices: This facility does not have close vent systems.

Floating Roof Tanks: This facility does not have floating roof tanks.

40 CFR §63.2520(e)(10) Notification of Process Change

There were no process changes to this facility during this reporting period that meet the requirements of this subpart.