



## REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

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November 2, 2007

### Certified Mail

Mr. Thomas Mistretta  
Plant Manager  
DuPont Electronic Polymers L.P.  
1515 Nicholas Road  
Dayton OH, 45418

Re: Emissions Units P025, P026 & P027

Dear Mr. Mistretta:

### WARNING LETTER

This letter is in regards to Ohio EPA emissions units P025, P026 & P027 located at DuPont Electronic Polymers' (DuPont's) facility on Nicholas Road, Ohio EPA Facility ID 0857040727. Following the March 27, 2007 annual facility inspection (AFI) and internal report review, the Regional Air Pollution Control Agency (RAPCA) has identified several issues with respect to operation of P025 and P026, conical dryer systems, and P027, a centrifuge system. Permit to Install (PTI) 08-04232, issued on July 24, 2001, requires each of these emissions units to be controlled by a common carbon adsorption unit.

During the March 2007 AFI, RAPCA verified that P026 was not in service. This emissions unit was never fully operated following its installation in 2001 due to design flaws. A PTO application for P026 was never submitted and permission to operate P026 under PTI 08-04232 has expired. Should DuPont elect to bring P026 into service, a new PTI must first be obtained. DuPont indicated their future plans involving installation of a new conical dryer in place of P026. A new PTI must be issued prior to installation or operation of a new dryer.

Following review of DuPont's quarterly deviation reports, it came to RAPCA's attention that during the second quarter of 2006, P025 operated for eight days while venting to a water scrubber, instead of the required carbon adsorber, resulting in the release of 681 pounds of Methylene Chloride (MeCl<sub>2</sub>). During the March 2007 AFI, DuPont explained that they do not vent P025 to the carbon adsorber when using process materials that do not contain MeCl<sub>2</sub>. Instead, they vent the emissions unit to a water scrubber. For P025 and P027, Part II.B.1 of PTI 08-04232, states, "The permittee shall employ a carbon adsorption unit and maintain an overall removal efficiency at or above 95% while the emissions unit is in operation." Venting P025, and/or P027, at any time during operation, to a control device other the carbon adsorber is a violation of PTI 08-04232.

Mr. Thomas Mistretta  
DuPont Electronic Polymers  
November 2, 2007  
Page 2

Due to the fact that PTI 08-04232 does not provide DuPont with the flexibility to vent P025 and P027 to an alternate control device, DuPont must request a modification to PTI 08-04232 to allow the use of a scrubber during periods of operation when  $\text{MeCl}_2$  is not contained in the product. Until a PTI modification is issued for use of an alternate control device, DuPont is required to vent emissions from P025 and P027 to the carbon adsorber at all times during operation. Within 30 days of receipt of this letter, RAPCA requests that DuPont submit an application for a PTI modification for use of alternate process controls on P025 and P027 and also submit a written commitment to cease use of the scrubber until a PTI modification is issued. Included with the PTI application should be a detailed narrative to discuss the two operating scenarios.

Pursuant to Part II.C.3 of PTI 08-04232, DuPont is required to monitor and record that coolant is flowing to each condenser at the beginning and end of each batch operation for P025 and P027. During the March 2007 AFI, RAPCA verified that this is being done, however, DuPont indicated that they would like to remove this requirement from the permit. In order for RAPCA to consider this request, it must be contained in the application to modify PTI 08-04232.

RAPCA reminds DuPont that there are still outstanding issues with respect to the CEMS requirements contained in PTI 08-04232. Per Part II.C.1 and Part II.C.2 of PTI 08-04232, DuPont is required to employ a CEMS to monitor and record OC (VOC) emissions in pounds per hour (lbs/hr) from the carbon adsorber when P025 and P027 are in operation. Currently the CEMS cannot undergo a representative Relative Accuracy Test Audit (RATA) as required by the PTI and 40 CFR Part 60, and is unable to give accurate lb/hr data because the exhaust gas flow is too low. Currently, a higher, worst-case, value of eight cubic feet per minute, the minimum detection limit for the monitoring system, is substituted for the actual flow which over-estimates the lb/hr VOC emissions. During previous conversations between RAPCA and DuPont, it was agreed that the PTI might be modified to allow the CEMS to read only in units of parts per million and instead serve as an indicator for change-out of the carbon beds. DuPont should request this modification in the PTI application referenced above. Currently the CEMS is not complying with the terms and conditions of the permit due to its inability to measure an accurate flow rate.

If approval is granted to relieve the CEMS of its requirement to determine lb/hr VOC emissions, the PTI requirement to maintain a QA/QC plan, per 40 CFR Part 60, Appendix F, may also be removed. DuPont should include a request to remove the QA/QC plan with the PTI modification, however. In lieu of the requirement to maintain a QA/QC plan per 40 CFR Part 60, DuPont will be required to properly operate and maintain the CEMS in accordance with the manufacturer's recommendations, including any suggested QA/QC procedures. If the requirement to measure and record lb/hr VOC emissions is not removed, it will be necessary for DuPont to address deficiencies in the current QA/QC plan including the data assessment report, audit, calibration and RATA procedures.

Mr. Thomas Mistretta  
DuPont Electronic Polymers  
November 2, 2007  
Page 3

RAPCA has identified reporting issues and deficiencies. Pursuant to Part II.D.3 of PTI 08-04232 for P025 and P027, DuPont shall submit an annual report, summarizing OC (VOC) and Hazardous Air Pollutant (HAP) emissions, to RAPCA by January 31 of each year. DuPont's annual reports for 2005 and 2006 were not submitted until April 26, 2006 and April 30, 2007 respectively, in violation of PTI 08-04232.

RAPCA has identified missing information in the quarterly excess emission reports (EERs) required by PTI 08-04232 for P025 and P027. Part II.D.1 and Part II.D.2 of PTI 08-04232 requires that all instances of OC (VOC) values in excess of the applicable limits be reported. If there were no excess emissions during the calendar quarter, a statement to that effect shall be submitted in the report. DuPont's quarterly reports reference compliance with HAPs limitations; however, reports from 4<sup>th</sup> quarter 2004 to present fail to specifically address OC (VOC) emissions. While RAPCA is aware that lb/hr OC (VOC) emissions from the CEMS are over-estimated due to the flow issue, RAPCA requests that DuPont submit a written report which provides any exceedances of the OC (VOC) emissions limitations from 4<sup>th</sup> quarter 2004 to present or states, specifically, that none have occurred. Additionally, all future reports must contain this information until/unless the reporting requirement is changed or removed.

Quarterly reports for 3<sup>rd</sup> qtr 2006, 4<sup>th</sup> qtr 2005, 4<sup>th</sup> qtr 2004, 3<sup>rd</sup> qtr 2004, 1<sup>st</sup> qtr 2004 and 3<sup>rd</sup> qtr 2003 identify days when calibration checks on the CEMS were not conducted as required by PTI 08-04232. No explanation was given as to why the calibration checks were not performed. RAPCA requests that DuPont submit an explanation for the missing calibration checks during the above quarters as well as corrective actions to prevent this from occurring in the future.

In summary, to address the above permitting issues, RAPCA requests that, within 30 calendar days of receipt of this letter, DuPont submit a PTI application to modify PTI 08-04232. Addressed in the application should be the following:

1. Plans for P026, such as a request to install a new dryer in place of P026, to permanently shutdown and withdraw P026, or to bring P026 into service.
2. The use of an alternate control device (i.e. the scrubber) for P025 and P027 when using process materials that do not contain  $\text{MeCl}_2$ , including a detailed narrative discussing the two operating scenarios.
3. Removal of the requirement to monitor and record coolant flow to each condenser for P025 and P027.
4. Removal of the CEMS requirement to monitor lb/hr OC (VOC) emissions for P025 and P027 and instead use the CEMS to monitor and record only in units of parts per million, serving as an indicator for carbon bed change-out.
5. In conjunction with #4 above, removal of the QA/QC plan, required by 40 CFR. Part 60, Appendix F, for the CEMS.

Mr. Thomas Mistretta  
DuPont Electronic Polymers  
November 2, 2007  
Page 4

To address the above reporting issues, RAPCA requests that, within 30 calendar days of receipt of this letter, DuPont submit the following reporting information:

1. A written report which provides any exceedances of the OC (VOC) emissions limitations from 4<sup>th</sup> quarter 2004 to present or states, specifically, that none have occurred.
2. An explanation for the missing calibration checks during 3<sup>rd</sup> qtr 2006, 4<sup>th</sup> qtr 2005, 4<sup>th</sup> qtr 2004, 3<sup>rd</sup> qtr 2004, 1<sup>st</sup> qtr 2004 and 3<sup>rd</sup> qtr 2003 as well as corrective actions.

RAPCA hopes to resolve the above issues as expeditiously as possible. If you have any questions regarding this letter or the reporting issues, please contact me at (937) 496-7541. If you have any questions pertaining to the PTI modification, please contact Mike Maleski at (937) 225-5454.

Sincerely,



Christine Swetz  
Air Pollution Control Specialist  
Abatement Unit

cc: Mike Maleski, RAPCA  
Jennifer Riley, RAPCA  
Christopher Clinefelter, RAPCA  
Becky Pohlman, RAPCA

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Mr. Thomas Mistretta  
Plant Manager  
DuPont Electronic Polymers L.P.  
1515 Nicholas Road  
Dayton, OH 45418

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