

STATEMENT OF BASIS for THE CHEMOURS CHAMBERS WORKS

TITLE V OPERATING PERMIT SIGNIFICANT MODIFICATION

Program Interest (PI): 65473 / Permit Activity Number: BOP240002

I. FACILITY INFORMATION

Chemours Chambers Works is located at 67 Canal Road, Deepwater, Salem County, NJ 08023 and consists of plant which manufactures surface protection materials, lubricants and elastomeric polymers. The facility is owned and operated by The Chemours Company, FC LLC

The facility is classified as a major facility based on its potential to emit 235 tons per year of volatile organic compounds)

It is also classified as a major hazardous air pollutant (HAP) facility. A HAP emitting facility is designated as major when the allowed emissions exceed 10 tons per year of any individual hazardous air pollutant or 25 tons per year of any combination of individual hazardous air pollutants that may be emitted simultaneously.

This permit allows individual hazardous air pollutants to be emitted at a rate not to exceed: 1,740 pounds per year of Benzene 1,680 pounds per year of Chloroform, 4,000 pounds per year of Hydrogen Chloride, 28 pounds per year of Hexamethylene 1,6; 5,000 pounds per year of Hydrogen Fluoride; 9,100 pounds per year of Methyl Chloride; 4,000 pounds per year of Methylene Chloride; 27,460 pounds per year of MIBK; 800 pounds per year of Nitrobenzene; 400 pounds per year of Phosgene; 5,440 pounds per year of Tetrachloroethylene; and 17,720 pounds per year of Xylene

II. AREA ATTAINMENT CLASSIFICATION

The Federal Clean Air Act (CAA) sets National Ambient Air Quality Standards (NAAQS) for six common air pollutants. These commonly found air pollutants (also known as "criteria pollutants") are particulate matter, ground-level ozone, carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead. The US Environmental Protection Agency (USEPA) also classifies areas as "attainment" or "nonattainment" for each criteria pollutant, based on the magnitude of an area's problem. Nonattainment classifications are used to specify what air pollution reduction measures an area must adopt, and when the area must reach attainment. Currently, the entire State of New Jersey is designated as nonattainment for the 8-hour ozone NAAQS. New Jersey is designated attainment for all other pollutants. For nonattainment classification refer to <https://www.epa.gov/green-book/green-book-national-area-and-county-level-multi-pollutant-information>.

III. BACKGROUND AND HISTORY

The equipment that emits air contaminants from this facility include: storage tanks, tanks, separation tanks with condensers, mixing kettles, reactors (jacketed and reactor systems), glass lined reactors, distillation stills with pumps, tube trailer, volatiles bath, heat exchange mixers, flaker, sludge handling system, lime slaking, wastewater sump, clarifiers, generators, elastomers, compressors, fire pumps, portable air compressors, phase separators, homogenizer, receiver with separator, precipitators, vessels, pack out station, dryers, hot air tray dryers and control devices that include process vessels; condensers, bag filters, vacuum jets, scrubbers, and bag houses.

A Facility-Wide Risk Assessment will be conducted during the next Operating Permit Renewal process. Health Risk Assessment was not conducted with this permit modification, since no changes were made to Air Toxics (including HAPs) emissions.

This is a Permit Modification and includes the following changes:

1. To include applicable provisions of 40CFR63, Subpart GGGGG – National Emission Standards for Hazardous Air Pollutants: Site Remediation. The facility was previously subject to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Resource Conservation and Recovery Act (RCRA) for its remediation work. On December 22, 2022, EPA removed exempted site remediations performed under the authority of CERCLA and those conducted under RCRA. The requirements for NESHAP GGGGG are now added to the following three insignificant sources at the facility,

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- A. IS5506 - Blower - Sub-Slab Depressurization System-Ventilation Building.
- B. IS5507- Interceptor Wells System which are part of a transfer system.
- C. IS5508 dense non-aqueous phase liquid (DNAPL) 55-Gallon Drums.

2. To include Requirement # 22 to Facility Specific Requirements at FC level that requires the facility to conduct an air quality impact/dispersion analysis to evaluate the air quality impacts from the facility's emissions of "Perfluoroalkyl and polyfluoroalkyl substances" or "PFAS".

There are no proposed changes to air contaminant allowable emission rates.

IV. CASE-BY-CASE DETERMINATIONS

No case-by-case determinations were required for this modification.

V. EMISSION OFFSET REQUIREMENTS

This modification is not subject to Emission Offset requirements.

VI. BASIS FOR MONITORING AND RECORDKEEPING REQUIREMENTS

The facility's operating permit includes monitoring, recordkeeping and reporting requirements that are sufficient to demonstrate the facility's continued compliance with the applicable requirements consistent with the following:

1. Provisions to implement the testing and monitoring requirements of N.J.A.C. 7:27-22.18, the recordkeeping and reporting requirements of N.J.A.C. 7:27-22.19, and all emissions monitoring and analysis procedures or compliance assurance methods required under the applicable requirements, including any procedures and methods promulgated pursuant to 40 CFR 64; and
2. Where the applicable requirement does not require direct periodic monitoring of emissions, the Department requires periodic monitoring of surrogate parameters sufficient to yield reliable data from the relevant time period that are representative of the facility's compliance with the permit.

For the sub-slab system (IS5506) and the interceptor wells system, (IS5507) the facility will monitor the VOC and HAPs emissions annually by grab sampling.

For the DNAPL 55-Gallon Drums (IS5508) the facility will monitor HAPs by grab sampling per change of material.

3. In some cases, direct periodic monitoring of emissions and/or surrogate parameters is not required due to one or more of the following:
 - Equipment size and capacity limitations,
 - Subject equipment being permitted at the maximum rated capacity,
 - There is no specific state or Federal standard that applies to this piece of equipment,
 - Not a pollutant of concern for this piece of equipment,
 - Agreements with EPA on the frequency of testing and monitoring for combustion sources.

VII. APPLICABLE STATE AND FEDERAL RULES

This modification is subject to New Jersey Air Pollution Control Regulations, codified in N.J.A.C. 7:27-1 through 34, as applicable. A complete text of these regulations is available at:

<http://www.nj.gov/dep/aqm/rules27.html>

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This modification is also subject to Federal regulations listed below.

NESHAP Subpart GGGGG:: National Emission Standards for Hazardous Air Pollutants: Site Remediation

The Greenhouse Gas (GHG) emissions from this facility are 102,535 TPY CO₂e and there is no GHG emissions increase. This modification is not subject to PSD rules at 40 CFR 52.21.

VIII. FACILITY'S COMPLIANCE STATUS

Responsible Official at the facility has certified that the facility currently meets all applicable requirements of the Federal Clean Air Act and the New Jersey Air Pollution Control Act. Based on this certification, the Department's evaluation of the information included in the facility's application, and a review of the facility's compliance status, the Department has concluded that this air pollution control operating permit should be approved.

This operating permit includes a permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. A permit shield provides that compliance with the relevant conditions of the operating permit shall be deemed compliance with the specific applicable requirements that are in effect on the date of issuance of the draft operating permit, and which form the basis for the conditions in the operating permit.

Prior to the expiration of the Operating Permit's five-year term, the facility will be required to apply for a renewal, at which time the Department will evaluate the facility and issue a public notice with its findings.

IX. EXEMPT ACTIVITIES

The facility's operating permit does not include exempt activities such as office and interior maintenance activities, maintenance shop activities, food preparation facilities, cafeterias and dining rooms, etc. A complete list of exempt activities, as allowed by the Operating Permit rule, can be found at N.J.A.C. 7:27-22.1.

FACILITY NAME (FACILITY ID NUMBER)
BOP050001

Activity Number assigned
by the Department

New Jersey Department of Environmental Protection Facility Specific Requirements

Emission Unit Number
assigned by the Facility

Brief description of
emission unit

Emission Unit: U40 Sewage Sludge Incinerators
Operating Scenario: OS Summary

OR

OS2 Fluidized Bed Incinerator

OS Summary lists all rules and requirements
that apply to an emission unit. An emission unit
may contain one or more pieces of equipment
and corresponding operating scenarios.

OSX denotes the operating scenario number and lists the rules
and requirements that apply to a scenario. An operating
scenario represents various ways (or scenarios) a piece of
equipment is permitted to operate.

Item
Number

Description of applicable
requirement

Monitoring method to
ensure compliance

Recordkeeping to show
facility's compliance

Actions and submittals
required for the facility

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	The permittee shall conduct an annual performance test for each pollutant in Table 2 of 40CFR62 Subpart LLL between 11 and 13 calendar months after the previous performance test or within 60 days of a process change. [40 CFR 62.16000(a)]	Other: Conduct the performance test using the test methods, averaging methods and minimum sampling volumes or durations as specified in 40CFR62 Subpart LLL and according to the testing, monitoring and calibration requirements specified in 40 CFR 62.16015(a). [40 CFR 62.16000(a)].	Other: (1) Maintain records of the results of initial, annual and any subsequent performance tests conducted to determine compliance with the emission limits and standards and/or to establish operating limits, as applicable. [40 CFR 62.16025(e)].	Submit a report: Annually to the Administrator and to the Department. The permittee shall submit an annual compliance report as specified in 40 CFR 62. [40 CFR 62.16000(d)]

Rule citation for
applicable requirement

Rule citation for
monitoring requirement

Rule citation for
recordkeeping requirement

Rule citation for submittal/
action requirement

Explanation Sheet for Facility Specific Requirements