UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MAY 2 9 2012

Mr. Stephen W. Harvill
Plant Manager
INVISTA S.a.r.l. Victoria Plant
P.O. Box 2626
Victoria, TX 77902-2626

Subject: Completeness Determination for the INVISTA S.a.r.l Greenhouse Gas Prevention of Significant Deterioration (PSD) Permit Application

Dear Mr. Harvill:

This letter is in response to your March 12, 2012, application to the Environmental Protection Agency (EPA) for a Greenhouse Gas Prevention of Significant Deterioration permit. EPA received this application on March 16, 2012. After our initial review of your application and all supporting information, we have determined that this application is incomplete (40 CFR Part 124) and additional information is required to consider it complete. Enclosed is a list of additional information required.

Upon receipt of the additional information, we will review it for completeness. If complete, we will issue a completeness determination on the technical information of your application. The information requested is necessary for EPA to develop a Statement of Basis and rationale for the terms and conditions for a draft permit. As we develop our preliminary determination, it may be necessary for EPA to request additional clarifying or supporting information. If the supporting information substantially changes the original scope of the permit application, an amendment or new application may be required.

While not required for the completeness determination, the EPA may not issue a permit until it has been established that the issuance of the permit will have no impact on endangered species pursuant to Section 7 of the Endangered Species Act. In addition, the EPA must undergo consultation pursuant to Section 106 of the National Historic Preservation Act. To expedite these consultations, the EPA requests that the permit applicants provide a biological assessment and cultural resources report covering the project and the action area. We request that you submit this information as early as possible, so that the EPA may issue a permit at the earliest possible time, and within the timeframes required by statute. At this time, Invista can request to assign specific representatives of Invista and/or its environmental consultant to act as designated non-federal representatives to the U.S. Fish and Wildlife Service, and the National Marine Fisheries Service if necessary, for purposes of Section 7 consultation.

If you have any questions regarding the review of your permit application, please contact Melanie Magee of my staff at (214) 665-7161 or magee.melanie@epa.gov.

Sincerely,

Carl E. Edlund, P.E.
Director
Multimedia Planning and
Permitting Division

cc: Mr. Mike Wilson, P.E., Director
Air Permits Division
Texas Commission on Environmental Quality

Enclosure

EPA Comments on Invista, Victoria Plant Greenhouse Gas permit application
Application dated March 12, 2012

Process Description

1. On page 3, the application indicates there are four tangentially fired water-tube boilers (Combustion Engineering Model VU-60). Please provide additional numerical technical data and benchmarking data to detail each boilers capacity and energy efficiency rating(s).

2. In your process description, please clarify if each boiler is dedicated to a specific fuel or fuel blend and if this design configuration was optimized to provide the most efficient results. To assist in the drafting of the permit, please provide additional information about the boiler operations. Specifically, if a boiler is dedicated to run high Btu or low Btu fuel and any additional operational restrictions that may need to be included from additional regulatory standards from the Clean Air Act or the Resource Conservation and Recovery Act (RCRA).

Additional Impacts Analysis

3. 40 C.F.R. Part 52.21(o), Additional Impact Analyses, requires an applicant to provide an analysis of the impairment to the soils and vegetation that would occur as a result of the modification. Please provide an assessment to support this requirement.

BACT for the Boilers

4. On page 10, the BACT analysis for the boilers notes that a search was completed of EPA's RACT/BACT/LAER Clearinghouse (RBLC) for similar sources. This is not the only source of information for BACT determinations. BACT determinations should be based on current technology available for similar units and from the most recent regulatory decisions made in actual issued permits by State and Federal permitting authorities as well as additional sources of information from literature searches. Please identify and clarify if additional sources of information were reviewed as comparable available control options, and if none were reviewed, please provide such an analysis.

5. The BACT analysis for the boilers notes on page 15 of the application that the boilers "already employ energy efficiency measures." The application continues by stating "Refurbishing and modernizing the boilers will restore and improve the energy efficiency measures that are already in place." Please explain what is meant by refurbishing and modernizing these boilers and if they will be considered as "reconstructed" for NSPS purposes. Also, please provide a numerical efficiency for each boiler and the anticipated numerical efficiency associated with each GHG emission reduction measure included as a BACT analysis. Additionally, please provide any numerical technical analysis that may

have been completed to ensure that the most efficient boiler configuration was considered.

6. In addition to the longer-term CO_2e emission limit provided in the application, please provide a proposed BACT limit for each boiler based on the unit's efficiency or short term emission limits. If an emission limit is not possible to establish, please provide a technical justification to support your conclusion.

Basis of Emission Calculations

7. On page 19 of the permit application, the projected actual emission rate from the boilers was calculated based on the projected actual emission rates. To establish whether a new or modified source is major, the maximum capacity of a stationary source to emit a pollutant under its physical and operational design must be established. Please provide the potential to emit calculations for the various emission units within the permit application.