

March 12, 2010

INVISTA S.à r.l.-Seaford Plant (INVISTA)
25876 DuPont Road
Seaford, DE 19973

ATTENTION: Steven R. Kimpton
Plant Manager

SUBJECT: **Cancellation of Permits associated with Emission Units permanently shutdown**

Dear Mr. Kimpton:

The Department accepts the cancellation requests dated December 31, 2009 and February 23, 2010 as formal notification to cancel all the permits identified in the Attachment below. The listed permits which allow for the operation of the emission units described in the Attachment are hereby cancelled due to the permanent shutdown of the associated emission units located at 25876 DuPont Road, Seaford, Delaware. Operation of these emission units after the date of this letter shall constitute a violation of 7 **DE Admin. Code** 1100.

Please contact Phaniel C. K. Bediako, Ph.D. at (302) 739-9402 if you have any questions or concerns.

Sincerely,

Paul E. Foster, P.E.
Program Manager
Engineering & Compliance Branch

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pc: Dover (Title V) File
Joanna L. French, P.E.
Phaniel C. K. Bediako, Ph.D.
Jack Sipple
Frank Gao
John Outten

INVISTA-Seaford Plant

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ATTACHMENT: LIST OF CANCELLED PERMITS	
PERMIT NUMBER	EQUIPMENT DESCRIPTION
APC-83/071-OPERATION (Amendment 5)(NOx RACT) dated October 3, 2002	231 MMBTU/hr Combustion Engineering Boiler (EU 002)
APC-82/035-OPERATION dated August 28, 1981	Coal Car Thawing Unit (EU 006)
APC-88/268-OPERATION dated July 15, 1988	18 MMBTU/hr DOWTHERM Vaporizer (EU 011)
APC-88/270-OPERATION dated July 15, 1988	18 MMBTU/hr DOWTHERM Vaporizer (EU 013)
APC-88/271-OPERATION dated July 15, 1988	18 MMBTU/hr DOWTHERM Vaporizer (EU 014)
APC-88/272-OPERATION dated July 15, 1988	18 MMBTU/hr DOWTHERM Vaporizer (EU 015)
APC-88/273-OPERATION dated July 15, 1988	24 MMBTU/hr DOWTHERM Vaporizer (EU 016)
APC-88/274-OPERATION dated July 15, 1988	46.4 MMBTU/hr DOWTHERM Vaporizer (EU 017)
APC-88/275-OPERATION dated July 15, 1988	46.4 MMBTU/hr DOWTHERM Vaporizer (EU 018)
APC-80/1406-OPERATION dated September 17, 1980	Lindberg Reclamation Unit (Electric) (EU 021)
APC-80/1407-OPERATION dated September 17, 1980	Lindberg Reclamation Unit (Electric) (EU 022)
APC-80/1321-OPERATION (Amendment 1) dated May 12, 1982	Reflux Recovery Column on CP Line III Continuous Polymerization Processes (EU 025A)
APC-82/1189-OPERATION dated October 10, 1982	Two polymerizers and scrubbing machines No. 21 and No. 22 (EU 025A)
APC-2001/0302-OPERATION dated April 5, 2004	North Scrubber System (EU 025B)
APC-2001/0303-OPERATION dated April 5, 2004	South Scrubber System (EU 025B)
APC-2002/0741-OPERATION dated April 5, 2004	Middle Scrubber System (EU 025B)
APC-94/0853-CONSTRUCTION/OPERATION dated November 8, 1996	DOWTHERM Vent Condensers (EU 026)
APC-2005/0179-CONSTRUCTION/OPERATION dated October 5, 2005	Four (4) Adipic Acid Vacuum Conveyance Systems (EU 036)
APC-2005/0180-CONSTRUCTION/OPERATION dated October 5, 2005	
APC-2005/0181-CONSTRUCTION/OPERATION dated October 5, 2005	
APC-2005/0182-CONSTRUCTION/OPERATION dated October 5, 2005	

MEMORANDUM

TO: Paul E. Foster, P.E.

THROUGH: Joanna L. French, P.E.

FROM: Phaniel C. K. Bediako, Ph.D.

**SUBJECT: Cancellation of Permits
INVISTA-Seafood Plant**

DATE: March 2, 2010

BACKGROUND INFORMATION:

The Department received a letter dated December 31, 2009 and a supplementary letter dated February 23, 2010 in which INVISTA requested an administrative amendment to the Title V permit. According to the letter, several operations have been permanently shut down as a result of the restructuring. The major thrust of this restructuring was the shutdown of all batch and continuous Nylon polymerization processes. Furthermore, Bulk Continuous Filament (BCF) spinning operations have been discontinued. One (231) MMBTU/hr Combustion Engineering coal-fired boiler (Boiler No. 2) was permanently shut down as a result of the July 28, 2009 Consent Decree between the EPA, the Department of Justice, DNREC, and INVISTA.

The Company requested that the emission units which have been permanently shut down be deleted from the Title V permit and the associated 7 **DE Admin. Code** 1102 permits be cancelled. The Table identifies all the permits which are to be cancelled.

LIST OF PERMITS TO BE CANCELLED	
PERMIT NUMBER	EQUIPMENT DESCRIPTION
APC-83/071-OPERATION (Amendment 5) (NOx RACT) dated October 3, 2002	231 MMBTU/hr Combustion Engineering Boiler (EU 002)
APC-82/035-OPERATION dated August 28, 1981	Coal Car Thawing Unit (EU 006)
APC-88/268-OPERATION dated July 15, 1988	18 MMBTU/hr DOWTHERM Vaporizer (EU 011)
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APC-88/273-OPERATION dated July 15, 1988	24 MMBTU/hr DOWTHERM Vaporizer (EU 016)
APC-88/274-OPERATION dated July 15, 1988	46.4 MMBTU/hr DOWTHERM Vaporizer (EU 017)
APC-88/275-OPERATION dated July 15, 1988	46.4 MMBTU/hr DOWTHERM Vaporizer (EU 018)
APC-80/1406-OPERATION dated September 17, 1980	Lindberg Reclamation Unit (Electric) (EU 021)
APC-80/1407-OPERATION dated September 17, 1980	Lindberg Reclamation Unit (Electric) (EU 022)
APC-80/1321-OPERATION (Amendment 1) dated May 12, 1982	Reflux Recovery Column on CP Line III Continuous Polymerization Processes (EU 025A)

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INVISTA-Seaford Plant

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APC-94/0853-CONSTRUCTION/OPERATION dated November 8, 1996	DOWTHERM Vent Condensers (EU 026)
APC-2005/0179-CONSTRUCTION/OPERATION dated October 5, 2005	Four (4) Adipic Acid Vacuum Conveyance Systems (EU 036)
APC-2005/0180-CONSTRUCTION/OPERATION dated October 5, 2005	
APC-2005/0181-CONSTRUCTION/OPERATION dated October 5, 2005	
APC-2005/0182-CONSTRUCTION/OPERATION dated October 5, 2005	

RECOMMENDATION:

I recommend that the permits identified above be cancelled.

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pc: Dover (Title V) File
Jack Sipple
Frank Gao
Karen Mattio, P.E.
Dawn Minor
Joanna French, P.E.
John Outten