

Application Review

Issue Date: Date needed

Region: Washington Regional Office
County: Pitt
NC Facility ID: 7400021
Inspector's Name: Yongcheng Chen
Date of Last Inspection: 04/13/2023
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Avient Protective Materials LLC</p> <p>Facility Address: Avient Protective Materials LLC 5750 Martin Luther King Jr. Highway Greenville, NC 27834</p> <p>SIC: 2824 / Organic Fibers, Noncellulosic NAICS: 325222 / Noncellulosic Organic Fiber Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02D .0503, .0515, .0516, .0521, .1806 NSPS: HHH NESHAP: N/A (Avoidance) PSD: VOC, SO₂, NO_x PSD Avoidance: SO₂, NO_x NC Toxics: 15A NCAC 02D .1100 112(r): N/A Other: N/A</p>
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Contact Data			Application Data
<p style="text-align: center;">Facility Contact</p> Myrna Pacheco SHE-Environmental Engineer (252) 406-5872 5750 Martin Luther King Jr. Highway Greenville, NC 27834+8928	<p style="text-align: center;">Authorized Contact</p> Scott McIntyre Site Director (252) 707-3535 5750 Martin Luther King Jr. Highway Greenville, NC 27834+8928	<p style="text-align: center;">Technical Contact</p> Myrna Pacheco SHE-Environmental Engineer (252) 406-5872 5750 Martin Luther King Jr. Highway Greenville, NC 27834+8928	<p>Application Number: 7400021.23B Date Received: 02/24/2023 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 05754/T101 Existing Permit Issue Date: 02/10/2023 Existing Permit Expiration Date: 08/31/2023</p>

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2022	0.0600	9.99	70.28	8.62	3.30	3.05	1.71 [Toluene]
2021	0.0600	9.31	57.24	8.09	3.14	3.19	2.41 [Toluene]
2020	0.0500	7.17	39.63	6.78	2.37	3.89	1.99 [Toluene]
2019	3.32	47.99	55.91	31.63	5.74	4.23	2.11 [Toluene]
2018	2.73	45.36	68.01	30.30	5.74	4.63	2.73 [Toluene]

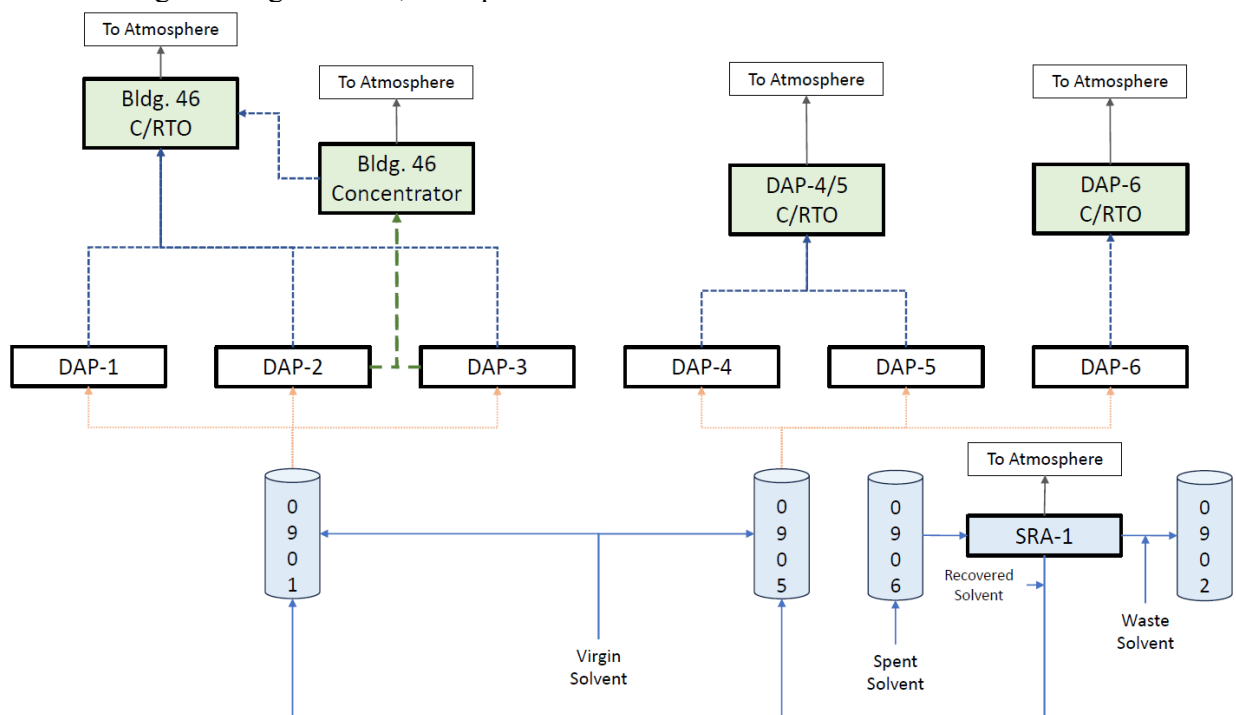
<p>Review Engineer: Jacob Larson</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 05754T102 Permit Issue Date: Date needed Permit Expiration Date: Date needed</p>
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1. Purpose of Application

Avient Protective Materials LLC (Avient) currently holds Title V Permit No. 05754T101 with an expiration date of August 31, 2023 for non-woven fabric manufacturing facility in Greenville, Pitt County, North Carolina. This application is for a permit renewal without modification. The renewal application was received on February 24, 2023 or at least six months prior to expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

2. Facility Description

The facility production is highly proprietary. This facility manufactures fiber and non-woven fabrics and employs approximately 350 persons operating 24/7, as workload dictates. The facility has six main buildings totaling over 500,000 square feet.



3. History/Background/Application Chronology

History/Background

December 20, 2016	TV permit renewal issued. Air Permit No. 05754T96 was issued with an expiration date of November 30, 2021.
September 18, 2018	Air Permit No. 05754T97 was issued for a minor modification to install heat exchangers and significant modification to revise PSD avoidance for NOx. Permit expiration date was renewed to August 31, 2023.
September 24, 2020	Air Permit No. 05754T98 was issued for facility ownership name change from “Greenville Service Company, Inc” to “DSM Protective Materials LLC”.
March 09, 2021	Air permit No. 05754T99 for first step of the two-step significant modification process (15A NCAC 02Q .0501(b)(2)) for production increase for Fiber Production Lines Nos. 1 through 6 (ID Nos. DAP1 through DAP6).
April 12, 2022	Air Permit No. 05754T100 for completion of second step of two step modification noted above.
November 07, 2022	Avient received NOV/NRE, consisting of three separate violations for improper O&M practices that resulted in excess downtime of THC CERMS for sources (ID Nos. AHU3, AHU7, and AHU10). All violations have been resolved as of November 30, 2022.
February 10, 2023	Air Permit No. 05754T101 changed facility name from DSM Protective Materials LLC to Avient Protective Materials LLC

Application Chronology

February 24, 2023	DEQ received permit application 7400021.23B for Title V renewal.
February 24, 2023	Sent acknowledgment letter indicating that the application for permit renewal was complete.
January 04, 2024	Technical additional information request for PFAS discloser.
January 23, 2024	Received completed PFAS discloser from facility and uploaded to Laserfiche.
February 05, 2024	Draft permit and review forwarded for comments to Permitting Supervisor.
February 11, 2024	Comments received from Mark Cuilla, Title V Permitting Chief.
February 14, 2024	Draft permit and review forwarded to the Stationary Compliance Branch for comments. No comments were received February 20, 2024.
February 14, 2024	Draft permit and review forwarded to the Washington Regional Office for comments. Minor comments were received March 07, 2024.

March 07, 2024	Draft permit forwarded to the applicant for comments. Facility requested to edit and consolidate emission sources. Received March 19, 2024.
March 19, 2024	Facility requested time to do walk through of facility to ensure accuracy of emission source list and the requested emission source consolidations. Event noted in IBEAM as Technical Additional Information Request. Received information April 17, 2024.
April 22, 2024	Draft permit forwarded to applicant for comments. Minor comments were received on May 07, 2024.
XXXX xx, 2024	Draft permit and permit review forwarded to public notice.
XXXX xx, 2024	Public comment period ends. ___ comments received.
XXXX xx, 2024	EPA comment period ends. ___ comments received.
XXXX xx, 2024	Permit issued.

4. Permit Modifications/Changes and TVEE Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Pages	Section	Description of Changes
--	Cover page and Throughout	Updated all dates and permit revision numbers.
4-11	Permitted Emissions Table	<ul style="list-style-type: none"> • Removed *** throughout table • Removed repeated control devices "S0936 (cont.)", "S0961 (cont.)", and "F0935 (cont'd)" and descriptions throughout table
12	2.1 A	<ul style="list-style-type: none"> • Removed "wet filter spinning (ID No. FBL 1)" emission source list
14	2.1 A Table	<ul style="list-style-type: none"> • Corrected "40 CFR 63, Subpart HHH" to "40 CFR 60, Subpart HHH" • Removed regulation "15A NCAC 02Q .0504" from table • Consolidated emission sources for simplicity
15	2.1 A.2.c.i	Corrected visual inspection requirement from yearly to monthly
16	2.1 A.2.f	Corrected numbering adding subparagraph "f"
16	2.1 A.4.e	Included bagfilters in Monitoring/Recordkeeping/Reporting for clarity
16-17	2.1 A.5	Updated NSPS HHH to current shell language
17	2.1 A.6.a	Added subparagraph designations i.-iii.
19	2.1 A.6.g	Corrected subparagraph designations from A,B,C to i, ii, iii
22	2.1 A.6.r	Updated reporting requirement to current shell language
23	2.1 A.7.a.i	Included implementation date as a reference to five-year condition requirement
24	2.1 B.1.f	Updated reporting requirement to current shell language
27	2.1 C.2.c	Updated Monitoring requirement to current shell language
29	2.2 A.1.d	Updated reporting requirement to current shell language
30	2.2 A.2.d	Updated reporting requirement to current shell language
31	2.2 B.1.d	Updated reporting requirement to current shell language
31	2.2 B.2	Updated Toxics requirement to current shell language
32	2.2 B.4	Added PFAS discloser condition
32	Section 4	Updated General Conditions (version 7.0, 08/21/23)

This permit renewal is without modification, and no changes to the Title V Equipment Editor are needed.

5. Regulatory Review

Avient is subject to the following regulations. The permit was updated to reflect the most current stipulations for all applicable regulations, where necessary.

- 15A NCAC 02D .0503, Particulate from Fuel Burning Indirect Heat Exchangers – This rule applies to the process heaters and hot water heaters. Process heaters with ID Nos. F0951, F0952, F0953, F0954, and F0955 shall not exceed 0.31 pounds per million Btu heat input of particulate matter into the atmosphere. Process heaters with ID Nos. F0956 and hot water heaters with ID Nos. HWH1, HWH2, HWH3, HWH4, HWH5, HWH6-A, HWH6-B and HWH6-C shall not exceed 0.22 pounds per million Btu heat input particulate matter into the atmosphere. No monitoring/recordkeeping/reporting is required for particulate emissions from the firing of natural gas and No. 2 fuel oil in these sources. Continued compliance is anticipated.

- 15A NCAC 02D .0515, Particulate from Miscellaneous Industrial Process - This rule applies to the sources with emissions vented to bagfilters (ID Nos. S1114, S2114, S3114, S4114, S5114, and S6114) and manufacturing lines (ID Nos. MAP-1 and PES-1). This rule limits the allowable PM emission from these sources to:

$$E = 4.10(P)^{0.67} \text{ for process rates } \leq 30 \text{ ton/hr}$$

where: P = the process weight rate (ton/hr)

E = allowable emissions (lb PM/hr)

The permit requires annual inspections of the bagfilters to ensure they provide effective control. Continued compliance is anticipated.

- 15 NCAC 02D .0516, Sulfur Dioxide Emission from Combustion Sources: This rule limits sulfur dioxide emissions to 2.3 pounds per million BTU heat input from the process heaters and hot water heaters. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas and No. 2 fuel oil in these sources. Continued compliance is anticipated.
- 15 NCAC 02D .0521, Control of Visible Emissions: This rule limits visible emissions to 20% opacity (except a six-minute averaging period can exceed 20% once per hour and four times per 24-hour period, provided visible emissions do not exceed 87% opacity). No monitoring/recordkeeping/reporting is required for the combustion of natural gas, No. 2 fuel oil, or VOC for the following emission sources:
 - Process heaters (ID Nos. F0951 through F0956),
 - Hot water heaters (ID Nos. HWH1, HWH2, HWH3, HWH4, HWH5, HWH6-A, HWH6-B and HWH6-C),
 - Concentrators (ID Nos. S0936, S0937, S0961, S0970),
 - Regenerative Thermal Oxidizers (ID Nos. F0935, F0962 and F0970), and
 - Uncontrolled general building exhaust points (ID Nos. GBL1-1, GBL1-2, GBL2-2, GBL3-2, GBL4-2, GBL5-2, and GBL6-2).
 - Bagfilters (ID Nos. S1114, S2114, S3114, S4114, S5114, and S6114).

Manufacturing lines (ID Nos. MAP-1 and PES-1) are subject to same 20% opacity condition described above but are subject to monthly monitoring requirements and semi-annual reporting requirements. Continued compliance is anticipated.

- 15 NCAC 02D .1806, Control and Prohibition of Odorous Emissions (State-enforceable only condition): The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary. Continued compliance is anticipated.
- 15A NCAC 02Q .0308(a); 15A NCAC 02Q .0309(b), Disclosure of Information Relating to Emissions of Fluorinated Chemicals (State-enforceable only condition): Permittee has ongoing duty to disclose the presence of material containing fluorinated chemicals that have the potential to emit fluorinated chemicals into the environment. Disclosers shall be submitted to the regional office supervisor within thirty days of facility becoming aware of such information. As part of the renewal process, the applicant was requested to respond to a series of PFAS related questions developed by the Department. These questions were developed to begin the creation of a

database of potential sources of PFAS. The questions and facility responses are included in the appendix of this review.

6. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS

NSPS (Subpart HHH) applies to solvent-spun synthetic fiber processes. The rule defines a solvent-spun synthetic fiber process to include “spinning solution preparation, spinning, fiber processing, and solvent recovery....”.

40 CFR 60, Subpart HHH limits overall VOC emissions from the fiber manufacturing process to no greater than 34 pounds per ton of solvent used (lbs/ton solvent). In the previous permit, testing, monitoring, and recordkeeping associated with the NSPS limit are identical to the requirements for demonstrating compliance with the BACT limit. The BACT limit for each fiber manufacturing line shall not exceed 12 pounds per ton of solvent feed on a calendar month basis. This permit renewal does not affect this status.

NESHAP/MACT/

The existing permit has a MACT avoidance condition (15A NCAC 02Q .0317) in Section 2.2 B.1. that requires monthly monitoring of facility-wide hazardous air pollutant (HAP) emissions and semiannual reporting of such emissions. Facility-wide emissions shall not exceed 10 tons per year (tpy) of any individual HAP or 25 tpy combined total HAPs to avoid applicability of any potentially applicable MACT standards. This permit renewal does not affect this status.

PSD

The facility is currently classified as a **Major** stationary source for the purpose of the Prevention of Significant Deterioration (PSD) permitting program. VOC, SO₂, and NO_x requirements and limitations are applicable to avoid PSD permitting per 15A NCAC 02D .0530.

Permit Section 2.1 A.6.a requirements include a Best Available Control Technology (BACT) determination required pursuant to 15A NCAC 02D .0530. The facility’s 6-month average VOC emission rate from each of the fiber manufacturing lines (**ID Nos. DAP1 through DAP6**), including emissions from the solvent tanks and undrawn yarn (UDY) tote loading operations, shall not exceed 12 pounds per ton of solvent feed (lbs/ton solvent) on a calendar month basis.

The QA/QC shall at the minimum include a provision for Calibration Drift (CD) determination and adjustments, data accuracy assessment, preventive maintenance, and program for corrective action for malfunctioning CERMS. All testing requirements listed in section 2.1 A.6.b have been met as of July 23, 2008.

Permit Section 2.1 B.1 requires VOC emissions from Building 12 Fiber Lines 1 through 5 to not exceed 25 tons per consecutive 12-month period. Permit Section 2.2 A.1 limits the total annual NO_x emissions from the combustion of natural gas and No. 2 fuel oil associated with the DAP process heaters, DAP hot water heaters and the Bldg. 46 Concentrator to not exceed 28 tons in any 12-consecutive month period to avoid applicability of 15A NCAC 02D.0530 for major sources and major modifications. Per permit Section 2.2 A.2, the total annual SO₂ emissions must not exceed 39 tons. This permit renewal does not affect this status.

Permit Section 2.2 A.1 limits the total annual NO_x emissions from the combustion of natural gas and No. 2 fuel oil associated with the DAP process heaters, DAP hot water heaters and the Bldg. 46 Concentrator to not exceed 28 tons in any 12-consecutive month period to avoid applicability of 15A NCAC 02D.0530

for major sources and major modifications. Per permit Section 2.2 A.2, the total annual SO₂ emissions must not exceed 39 tons. Permit renewal does not affect this status.

15A NCAC 02D .0530(u) Condition

Under 15A NCAC 02D .0530(u), Avient has elected to use *projected actual emissions* to avoid applicability of PSD requirements. Avient has demonstrated that the PAE for manufacturing lines (ID Nos. DAP1 through DAP6) is less than the *significant emissions increase* (as defined by 40 CFR 40 51.166(b)(23)).

Since at the time of the condition's inclusion in the permit, Avient's PAE was calculated pursuant to 40 CFR 51.166(b)(40)(ii)(a) and (b), minus baseline actual emissions and the calculated result for VOCs was higher than 50% of the significance threshold and did not involve the increase in the emission unit's design capacity or its potential to emit for the regulated NSR pollutant, only a five-year recordkeeping requirement was required. This five-year period has not ended; therefore, the permit condition needs to remain in the renewed permit. This renewal does not change the status of this requirement. The permit condition was implemented on March 09, 2021.

112(r)

The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the 112(r) thresholds. No change with respect to 112(r) is anticipated under this permit renewal.

CAM

The CAM rule (40 CFR 64; 15A NCAC 02D .0614) applies to each pollutant specific emissions unit (PSEU) at major TV facilities that meets all three following criteria:

- the unit is subject to any (non-exempt: e.g. pre November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source (i.e., 100 tons per year for criteria pollutants or 10/25 tons per year for HAPs).

40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold and use a control device to meet an applicable standard. Previous CAM reviews found CAM not to be applicable for any control devices because potential uncontrolled emissions were below the applicability threshold of 100 tons per year for criteria pollutants and 10/25 tons per year of HAPs. No new controls have been added since the last renewal; therefore, CAM continues to not be applicable. This permit renewal does not affect this status.

7. Facility Wide Air Toxics

The facility as a whole is subject to this State-Only requirement 15A NCAC 02D .1100 with emission limitations for formaldehyde and Toluene; it does not contain a 15A NCAC 02Q .0711 toxic condition. The emissions for formaldehyde and toluene shall not exceed the following limitations.

Emission Source ID No. or Group	Emission Source Description	Formaldehyde (lb/hr)	Toluene 1HR (lb/hr)	Toluene 24HR (lb/hr)
RTODAP13	RTO DAP 1-3 Source I.D. No. F0935	1.03E-01	4.67E-03	4.67E-03
RTODAP13	RTO DAP 4-5 Source I.D. No. F0962	7.35E-02	3.33E-03	3.33E-03
RTODAP6	RTO DAP 6 Source I.D. No. F0962	8.13E-02	3.68E-03	3.68E-03
CNCDA23	Concentrator DAP 2-3 Source I.D. No. S0937	1.03E-01	4.66E-03	4.66E-03
HOFDAP1	Hot oil furnace DAP 1 Source I.D. No. F0951	8.82E-02	4.00E-03	4.00E-03
HWHDA1	Hot water heater DAP 1	8.82E-02	4.00E-03	4.00E-03
HOFDAP2	Hot oil furnace DAP 2 Source I.D. No. F0952	8.82E-02	4.00E-03	4.00E-03
HWHDA2	Hot water heater DAP 2	1.26E-01	5.73E-03	5.73E-03
HOFDAP3	Hot oil furnace DAP 3 Source I.D. No. F0953	8.82E-02	4.00E-03	4.00E-03
HWHDA3	Hot water heater DAP 3	8.82E-02	4.00E-03	4.00E-03
HOFDAP4	Hot oil furnace DAP 4 Source I.D. No. F0954	8.82E-02	4.00E-03	4.00E-03
HWHDA4	Hot water heater DAP 4	1.26E-01	5.73E-03	5.73E-03
HOFDAP5	Hot oil furnace DAP 5 Source I.D. No. F0955	8.82E-02	4.00E-03	4.00E-03
HWHDA5	Hot water heater DAP 5	1.26E-01	5.73E-03	5.73E-03
HOFDAP6	Hot oil furnace DAP 6 Source I.D. No. F0956	1.04E-01	4.73E-03	4.73E-03
HWHDA6A	Hot water heater A DAP 6	1.05E-01	6.80E-03	6.80E-03
HWHDA6B	Hot water heater B DAP 6	1.05E-01	6.80E-03	6.80E-03
HWHDA6C	Hot water heater C DAP 6	1.05E-01	6.80E-03	6.80E-03
HWH1MAP	Hot water heater 1 MAP Source I.D.: I-MAP-H1 & H2	1.29E-02	5.85E-04	5.85E-04

The Permittee has submitted a toxic air pollutant dispersion modeling analysis dated December 05, 2012 for the facility's toxic air pollutant emissions as listed in the table above. The modeling analysis was reviewed and approved by the AQAB on September 27, 2013. Modeled sources were updated on permit T96¹ to reflect sources that were removed from facility and existing sources that were not included in the 2013 source list. The 2016 toxics evaluation, conducted by the DAQ concluded that the changes did not present a health risk to the public.

8. Facility Emissions Review

The facility-wide potential emissions do not change under this TV permit renewal. Actual emissions for criteria pollutants and HAPs for the years 2018 through 2022 are provided in the header of this permit review.

¹ Richard Simpson (December 12, 2016)

9. Compliance Status

DAQ has reviewed the compliance status of Avient. During the most recent inspection, conducted on April 13, 2023 by Yongcheng Chen of the Washington Regional Office, the facility appeared to be in compliance with all applicable requirements. The facility's Annual Compliance Certification was received on January 26, 2024 and indicated compliance with all applicable requirements in 2023.

Avient received NOV/NRE on November 07, 2022, consisting of three separate violations for improper O&M practices that resulted in excess downtime of THC CERMS for sources (ID Nos. AHU3, AHU7, and AHU10). All violations have been resolved as of November 30, 2022.

10. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 02Q .0521 above. No affected states or local agencies are within 50 miles of this facility.

11. Other Regulatory Considerations

- A P.E. seal is NOT required for this renewal application.
- A zoning consistency determination is NOT required for this renewal application.
- A permit fee is NOT required for this renewal application.
- EPA has promulgated a rule (88 FR 47029, July 21, 2023), with an effective date of August 21, 2023, removing the emergency affirmative defense provisions in operating permits programs, codified in both 40 CFR 70.6(g) and 71.6(g). EPA has concluded that these provisions are inconsistent with the EPA's current interpretation of the enforcement structure of the CAA, in light of prior court decisions². Moreover, per EPA, the removal of these provisions is also consistent with other recent EPA actions involving affirmative defenses³ and will harmonize the EPA's treatment of affirmative defenses across different CAA programs.

As a consequence of this EPA action to remove these provisions from 40 CFR 70.6(g), it will be necessary for states and local agencies that have adopted similar affirmative defense provisions in their Part 70 operating permit programs to revise their Part 70 programs (regulations) to remove these provisions. In addition, individual operating permits that contain Title V affirmative defenses based on 40 CFR 70.6(g) or similar state regulations will need to be revised.

² NRDC v. EPA, 749 F.3d 1055 (D.C. Cir. 2014).

³ In newly issued and revised New Source Performance Standards (NSPS), emission guidelines for existing sources, and NESHAP regulations, the EPA has either omitted new affirmative defense provisions or removed existing affirmative defense provisions. See, e.g., National Emission Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants; Final Rule, 80 FR 44771 (July 27, 2015); National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters; Final Rule, 80 FR 72789 (November 20, 2015); Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Commercial and Industrial Solid Waste Incineration Units; Final Rule, 81 FR 40956 (June 23, 2016).

Regarding NCDAQ, it has not adopted these discretionary affirmative defense provisions in its Title V regulations (15A NCAC 02Q .0500). Instead, DAQ has chosen to include them directly in individual Title V permits as General Condition (GC) J.

Per EPA, DAQ is required to promptly remove such impermissible provisions, as stated above, from individual Title V permits, after August 21, 2023, through normal course of permit issuance.

12. Recommendations

The permit renewal application for Avient Protective Materials, LLC. located in Greenville, Pitt County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. DAQ recommends the issuance of Air Permit No. 05754T102.

13. Appendix

PFAS Questionnaire- Permittee response in blue.

DAQ Question 1:

Will your facility use any material or products in your operations that contain fluorinated chemicals? If so, please identify such materials or products and the fluorinated chemicals they contain.

Avient- The manufacturing process does not utilize fluorinated chemicals.

DAQ Question 2:

Will your facility formulate/create products or byproducts (directly or indirectly) that contain fluorinated chemicals (across multiple media)? If so, please identify such products or byproducts and the fluorinated chemicals they contain.

Avient – The Greenville facility does not formulate or create products or byproducts (directly or indirectly) containing fluorinated chemicals.

DAQ Question 3:

Will your facility generate solid, liquid, or gaseous related emissions, discharges, or wastes/products containing fluorinated chemicals? If so, please identify such waste streams or materials and the fluorinated chemicals they contain.

Avient- Neither solid nor liquid emissions, discharges, nor waste/products containing fluorinated chemicals will be generated at our facility, except for waste disposal resulting from the cleaning and maintenance activities of the firefighting system installed at the site that uses AFFF.

DAQ Question 4:

Do your facility's processes or operations use equipment, material, or components that contain fluorinated chemicals (e.g., surface coating, clean room applications, solvents, lubricants, fittings, tubing, processing tools, packaging, facility infrastructure, air pollution control units)? Could these processes or operations directly or indirectly (e.g., through leaching, chemical process, heat treatment, pressurization, etc.) result in the release of fluorinated chemicals into the environment?

Avient- Commercially available products are used to maintain and repair equipment (e.g. lubricants) that may contain fluorinated chemicals. The products are used according to the manufacturer's specifications, and any release to the environment could be considered insignificant.

DAQ Question 5:

List the fluorinated chemicals identified (i.e., through testing or desktop review) above in your response under the appropriate methods/approaches? If one is not, are they on any other known US or International target lists? OTM-45 (air emissions) Methods 533 & 537.1 (drinking water) SW-846: Method 8327 (water) Draft Method 1633 (water, solids, tissue) Total PFAS" Draft Method 1621 for Adsorbable Organic Fluorine (wastewater) Non targeted analytical methods Qualitative approach through suspect screening.

The method 1633 detected the levels below. According to the results, the amounts detected in wastewater are insignificant.

PIPE 004 Perfluoro-2-proxypropanoic acid (HFPO-DA) ng/L 1.05J

PIPE 004 Perfluorobutanoic acid (PFBA) ng/L 1.90J

PIPE 004 Perfluorohexanesulfonic acid (PFHxS) ng/L 0.149J

PIPE 004 Perfluorooctanesulfonic acid (PFOS) ng/L 0.270J

PIPE 004 Perfluorooctanoic acid (PFOA) ng/L 0.137J

PIPE 003 Perfluoro-2-proxypropanoic acid (HFPO-DA) ng/L 0.819J

"J" indicates an estimated result reported below the laboratory reporting limit and above the laboratory method detection limit.

DAQ Question 6:

Are there other facilities or operations in the U.S. or internationally engaged in the same or similar activities involving fluorinated chemicals addressed in your response to the above questions? If so, please provide facility identification information? In addition, are there any ISO (International Organization for Standardization) certification requirements?

Avient- Fluorinated chemicals are not used in the manufacturing process or in the formulation/creation of any products or byproducts manufactured by Avient protective materials facilities.

DAQ Question 7:

Do you plan to store AFFF on site, use it in fire training at the site, use it for fighting fires at the facility, or include it in a fire fighting system at the site?

Avient- AFFF is used at the Avient Greenville site for firefighting purposes.

DAQ Question 8:

Are other emerging contaminants (e.g., 1,4-dioxane, brome, perchlorate, 1,2,3-Trichloropropane) used in some capacity within your facility or operations?

Avient – The Greenville facility does not use any other emerging contaminants in its operations or facilities.

DAQ Question 9: Do you need technical assistance to answer the questions above.

There is no need for assistance.