

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

13

SEP 9 2008

OFFICE OF AIR AND RADIATION

Barbara Dankmyer Environmental Manager INVISTA Camden Plant P.O. Box 7000 Camden, SC 29021

Re:

Amendment to the April 17, 2008 Petition Approval to Use Alternative Missing Data Substitution at INVISTA's Camden Plant (Facility ID

(ORISPL) 880057)

Dear Ms. Dankmyer:

On March 13, 2007, INVISTA submitted a petition to the United States Environmental Protection Agency (EPA) under 40 CFR 75.66, in which INVISTA requested to use alternative substitute data for nitrogen oxides (NO<sub>x</sub>) concentration at its Camden Plant. By letter dated November 29, 2007, INVISTA corrected its petition. On April 17, 2008, EPA approved the petition, with conditions. The purpose of this letter is to amend the conditions of that approval.

The April 17, 2008 petition approval allows INVISTA to use an alternative maximum potential  $NO_x$  concentration for the purposes of recalculating the Camden Plant's  $NO_x$  mass emissions for the 2003-2006 ozone seasons. However, due to a rounding error, Camden Plant's 2006 ozone season  $NO_x$  emissions were miscalculated by EPA in the petition response. As a result, EPA is amending Table 3 in the April 17, 2008 petition approval to show that the total  $NO_x$  emissions for 2006 were 310.6 tons, rather than the 310 tons as was previously stated by EPA.

Table 3: Impact of the Approved Alternative MPC Value on the 2004-2006 NO<sub>x</sub> Mass Emissions (Camden Plant, CS01)

(Cumden Flant, Cool)	,		
Ozone Season	2004	2005	2006
NO <sub>x</sub> Tons Previously Reported	156	217	273.3
Additional NO <sub>x</sub> TonsRecalculated	12	181	37. <b>3</b>
Total NO <sub>x</sub> Tons After Recalculation	168	398	310.6

As a result, INVISTA will be required to surrender a total of 311 tons of  $NO_x$  allowances for compliance with the 2006  $NO_x$  Budget Program ozone season. This is an additional 38 tons beyond the 273 tons previously reported by INVISTA.

If you have any questions regarding this correspondence, please contact Venu Ghanta of my staff, at (202) 343-9009. Thank you for your continued cooperation.

Sincerely,

Sam Napolitano, Director Clean Air Markets Division

cc: David McNeal, EPA Region IV
Stacey Gardner, South Carolina DHEC
Kevin Tran, CAMD
Kenon Smith, CAMD
Venu Ghanta, CAMD