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William Willets
State of North Carolina Division of Air Quality, NCDEQ
217 W. Jones Street
1641 Mail Service Center
Raleigh NC 27699-1641

Dear Mr. Willets,

This letter is to request authorization for the installation and testing of a Secondary Scrubber in controlling emissions from NCD-Hdr 1. The purpose of installing the Secondary Scrubber is to improve the overall efficiency of the existing Waste Gas Scrubber (WGS or NCD-Hdr 1) with respect to emissions of C3 Dimer Acid Fluoride (perfluoro (2-methyl-3-oxahexanoyl) fluoride, CAS 2062-98-8) and C3 Dimer Acid (perfluoro 2-(propyloxy) propionic acid, CAS 13252-13-6) as well as other poly- and perfluorinated compounds.

The Secondary Scrubber (SS) design will be a 15' tall, 16" diameter packed column that is direct mounted on top of the existing WGS. The current fresh caustic supply to the WGS will be split between the top of the SS and the current recirculation loop. Vapors exiting the SS will be routed into the Foambreaker as WGS vapors currently are. The existing WGS will be slightly modified to incorporate the SS. See Figure 1 on next page for a schematic of the proposed addition and modification.

Sincerely,



Brian D. Long

Figure 1: Proposed Secondary Scrubber

