

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on January 9, 2018.

Permit Number: **R30-10700001-2018**
Applications Received: **July 10, 2018 and December 19, 2018**
Plant Identification Number: **107-00001**
Permittee: **DuPont Specialty Products US, LLC**
Facility Name: **Washington Works**
Manufacturing Unit: **Acetal Resin Production (Part 3 of 14)**
Mailing Address: **P. O. Box 2800, Washington, WV 26181-2800**

Permit Action Numbers: MM01 and MM02

Revised: April 16, 2019

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 442.368 km Easting • 4,346.679 km Northing • Zone 17
Directions: Route 68 west from Parkersburg to intersection of Route 892. Continue west on Route 892 with the plant being on the north side about one mile from the intersection of Routes 68 and 892.

Facility Description

The purpose of these modifications is to allow recommissioning of an existing formaldehyde storage tank (DAGS), the replacement of an existing water cooling tower (DANS) in the Formaldehyde Area of the Delrin® business unit, and the replacement of pneumatic conveyors DUA-S, DWM-S, and HEZ-S with three new inclined-screw conveyors that are vented indoors.

Emissions Summary

There will be an increase of VOC's of 0.23 TPY, Formaldehyde of 0.13 TPY, Methanol of 0.10 TPY, Total HAPs of 0.23 TPY, and a reduction of 1.12 TPY of PM₁₀ as a result of these modifications.

Title V Program Applicability Basis

With the proposed changes associated with this modification of the Acetal Resin Production Permit, this facility as a whole maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year of aggregated HAPs. DuPont Washington Works is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	Particulate matter and opacity limits for manufacturing sources
	45CSR13	Construction/Modification Permits
	45CSR30	Operating Permit Requirement
State Only:	N/A	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The active permits/consent orders affected by this modification include the following.

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1596F	August 27, 2018	
R13-2381I	January 11, 2019	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B, which may be downloaded from DAQ's website.

Determinations and Justifications

Revisions have been made in the operating permit for the reasons detailed below.

MM01

45CSR13, Permit No. R13-1596F. This underlying Class II Administrative Update Permit was issued to allow the recommissioning of the “F” Formaldehyde Tank (DAGS) and the replacement of an existing water cooling tower (DANS) in the Formaldehyde Area of the Delrin® business unit.

The following changes have been made to the Title V Permit:

1. The Section 1.0 Equipment Table has been revised to reinstate the “F” Formaldehyde Tank (DAGS). The Safety Relief Valves (D02S, D03S, D04S, D09S, and D70S) have been added. The Formaldehyde Cooling Tower (DANS) will maintain its description by request of the company for simplicity although it does not match R13-1596F. The control device has been revised to “DAN-P” as the Drift Eliminator is integral to the process. The term “and inspection” in the description for the “A”, “B”, and “F” Formaldehyde Day Tanks (HAKS, HALS, and HAMS) has been removed.
2. Condition 4.2.5 has been revised to clarify that the process water cooling tower DAN-E is exempt from the requirement of Condition 4.2.5 of the permit to monitor opacity because visual methods are not practical for a cooling tower emission.
3. The “F” Formaldehyde Tank will be filled from either the “A” or “B” Formaldehyde Day Tank, but not both at the same time. “A” and “B” Tanks are filled separately from the process. “F” Tank will feed the next downstream unit process. While “F” Tank is feeding downstream, the tank is not expected to have any emissions when the tank’s liquid level is decreasing. Similarly, there is not an expectation that “A” or “B” Tanks will have any emissions provided the liquid level in either of those tanks is decreasing while they feed “F” Tank. While filling “F” Tank, the vapors from its headspace will be vented back to the tank from which it is receiving liquid. Thus, the amount of headspace volume displaced by the incoming liquid should equal the headspace increase of the tank being emptied. This vapor balancing practice should minimize emissions so that the current emissions from the existing tanks in the system should essentially remain the same. However, this method has not been proven to be effective for these emission units and as a contingency, direct venting to the scrubber from each tank is being reserved with this application. As a result, the Emission Limits for DAG-E have been increased in Appendix B.1.
4. The replacement of the Formaldehyde Cooling Tower (DAN-E) will result in a reduction of PM₁₀ emissions. This is reflected in Appendix B.1.
5. Relief Valve D03S has been added to the Permit due to the recommissioning of the “F” Formaldehyde Tank DAGS. The emissions from this relief valve have been added to Appendix B.1.
6. The annual VOC limit for D02-E in Appendix B.1 has been increased to 0.02 TPY to match the THAP limit.
7. The reinstated “F” Formaldehyde Tank (DAG) has been added to Appendix A.1 of Appendix A and Appendix B.1 of Appendix B.
8. Emission Source DBOS has been removed from Appendix B.1.

MM02

45CSR13, Permit No. R13-2381I. On January 11, 2019, DuPont Washington Works was issued a Class I administrative update, R13-2381I, to allow for removal of three ingredient pneumatic conveying systems and their replacement using three inclined-screw conveyors. The new conveyors have reduced potential emissions of PM-10 and will vent to the interior of the building rather than to the external atmosphere.

The following changes have been made to the Title V Permit:

1. Emission Sources DUA-S, DWM-S, and HEZ-S have been removed from the Section 1.0. Emission Units Table. As the new conveyors are vented indoors, they will not be added to the Emission Units Table.
2. As a result of the removal of the sources in 1. above, the particulate matter emissions limit given in Condition 6.1.3 (Appendix D.2) for DSZ-E and DZG-E have been reduced from 0.02 TPY and 0.34 TPY to 0.01 TPY and 0.14 TPY, respectively.
3. Process Control Devices DSX-P and HED-P have been removed from the facility. They have been removed from Appendix D.1 and HED-P has been removed from Appendix D.2.

MISCELLANEOUS CHANGES

1. Section 1.2 has been updated to reflect to most current version of the R13 Permits. The Table of Contents has been renumbered accordingly.
2. Updated the citation from “13-5.11” to “13-5.10” for Conditions 4.1.17, 5.1.11, 5.4.2.4, 6.1.6, and 9.1.5.
3. Condition 5.1.9 contained specifications for “comparable fuels” under 40 C.F.R. §261.38. Although R13-1849N Condition 4.1.11 still maintains this requirement, 40 C.F.R. §261.38 was repealed from final rule effective June 15, 2010 and has been removed from this Permit. Condition 5.1.9 has been changed to “Reserved”.
4. On February 12, 2019, “E. I. du Pont de Nemours and Company” transferred this Permit to “DuPont Specialty Products US, LLC”. This change has been made throughout the Permit.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A

Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478
michael.egnor@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Updated EPA address in Condition 3.5.3 after proposed permit was sent to EPA for review. Also, revised permittee's name from "E. I. du Pont de Nemours and Company" to "DuPont Specialty Products US, LLC".