

Fact Sheet



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

Permit Number: **R30-10700182-2020**

Application Received: **July 19, 2019**

Plant Identification Number: **03-054-107-00182**

Permittee: **The Chemours Company FC, LLC**

Facility Name: **Washington Works**

Business Unit: **Facilities, Construction, and Support (FC&S) (Part 12 of 14)**

Mailing Address: **P. O. Box 1217, Washington, WV 26181-1217**

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 862. Continue west on Route 862 with the plant being on the north side about one mile from the intersection of Routes 68 and 862.

Facility Description

Facilities, Construction and Support provides specialized maintenance services and construction capabilities to the manufacturing units at Chemours Washington Works. Facilities, Construction, and Support (FC&S) performs operations such as welding, painting, insulation fabrication and installation, and vehicle refueling in support of specific projects and specific maintenance requirements for other business units at the site. Included in this group are contracted services that are brought on-site for specialized activities of short duration, such as large component cleaning, sandblasting and painting.

Emissions Summary

Plantwide Emissions Summary for FC&S [Tons per Year]		
Regulated Pollutants	Potential Emissions	2018 Actual Emissions
Carbon Monoxide (CO)	0.04	0
Nitrogen Oxides (NO _x)	0.09	0
Particulate Matter (PM _{2.5}) ¹	0.9	0.27
Particulate Matter (PM ₁₀) ¹	1.86	0.31
Total Particulate Matter (TSP) ¹	13.33	0.33
Sulfur Dioxide (SO ₂)	0.01	0
Volatile Organic Compounds (VOC)	45.7	0.80

¹PM_{2.5} and PM₁₀ are components of TSP

Hazardous Air Pollutants	Potential Emissions	2018 Actual Emissions
Cumene	0.02	1.15E-02
Ethylene Glycol	0.07	0.02
Glycol Ethers	0.22	0
Toluene	0.22	0.16
Ethyl Benzene	0.1	0.08
Xylenes (mixed)	0.4	0.29
Methyl Isobutyl Ketone	0.01	0
Methylene Chloride	0.02	0
Methyl Methacrylate	0.01	0
Chromium	0.01	5.33E-05
Chromium VI	0.01	0
Cobalt	0.01	0
Manganese	0.01	2.25E-04
Nickel	0.01	3.54E-05
Benzene	0.01	0
n-Hexane	0.01	0
Total HAPs	1.14	0.6

Title V Program Applicability Basis

This facility has the facility-wide potential to emit over 100 tons per year of criteria pollutants (CO, NO_x, PM₁₀, SO₂, and VOC), over 10 tons per year of a single Hazardous Air Pollutant (HAP), and over 25 tons per year of aggregated Hazardous Air Pollutants (HAPs). Due to this facility's potential to emit over 100 tons per year of criteria pollutants (CO, NO_x, PM₁₀, SO₂, and VOC), over 10 tons per year of a single Hazardous Air Pollutant (HAP), and over 25 tons per year of aggregated Hazardous Air Pollutants (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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2 45CSR6 45CSR7 45CSR11 WV Code § 22-5-4 (a) (14) 45CSR30 40 C.F.R. Part 61 40 C.F.R. Part 82, Subpart F	Particulate matter and opacity limits for indirect heat exchangers. Open burning prohibited. Particulate matter and opacity limits for manufacturing sources. Standby plans for emergency episodes. The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Asbestos inspection and removal Ozone depleting substances.
State Only:	45CSR4 45CSR21, Section 30	No objectionable odors. Control of VOC emissions from cold and solvent metal cleaning.

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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
N/A	N/A	N/A

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," which may be downloaded from DAQ's website.

Determinations and Justifications

There were the following revisions of the previous permit renewal (issued on February 3, 2015):

- AA01 (issued on October 20, 2015) - removed Emission Point VCMDCS34E – Building Insulation Saw as it was no longer in service; removed Emission Point VZIS01E – Zytel Building Insulation Saw from the permit as it belonged to E.I. Dupont de Nemours & Company Washington Works Facility R30-10700001-2011 (Part 5 of 14); updated the Facility Name from “E. I. du Pont de Nemours and Company” to “The Chemours Company FC, LLC”; updated the Facility ID number from “10700001” to “10700182”; and updated the Facility phone number from “(304) 863-4240” to “(304) 863-4000.
- MM01 (issued on June 13, 2016) - added Gasoline Fuel Tank (VGDT01) to the equipment table and added this unit to conditions 5.1.1 and 5.2.1 which requires that it be loaded by submerged fill and that this fill be verified upon inspection; condition 5.3.1 was added that requires daily records showing the quantity of all gasoline delivered to the site and that these records be retained for at least 3 years.

During this permit renewal, there were the following changes:

- Emission Units Table 1.1 - removed the 125 gallon Gasoline Fuel Tank VCFT02 since it was shut down (emptied and not used); changed the installation year and capacity of the Diesel Fuel Tank VCFT01 from “1985” to “2014” and from “125 Gallons” to “200 Gallons” because it was replaced in 2014 with a new one; removed the 1,000 gallon VGDT01 Gasoline Fuel Tank; the capacity of the “Hotsy” Propane Hot Water Cleaner was corrected from 300 GPH to 360 GPH; and more descriptions were added for some emission units.
- Section 5.0 – requirements are removed because Gasoline Fuel Tanks VCFT02 and VGDT01 are no longer in use, and section is marked as “Reserved”.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility and are listed under a Permit Shield (condition 3.7.2) due to the following:

- a. 40 C.F.R. 60, Subpart K - “Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.” There are no petroleum liquid storage tanks in Facilities, Construction, and Support constructed, reconstructed or modified between these dates.
- b. 40 C.F.R. 60, Subpart Ka - “Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984.” There are no petroleum liquid storage tanks in Facilities, Construction, and Support constructed, reconstructed or modified between these dates with a capacity greater than 40,000 gallons.
- c. 40 C.F.R. 60, Subpart Kb - “Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.” There are no volatile organic liquid storage tanks constructed in Facilities, Construction, and Support after the effective date with a design capacity greater than 75 m³ (19,812.9 gallons).
- d. 40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry.” Facilities, Construction, and Support does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.
- e. 40 C.F.R. 60, Subpart DDD - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.” Facilities, Construction, and Support

does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.

- f. 40 C.F.R. 60, Subpart RRR - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.” Facilities, Construction, and Support does not produce any of the chemicals listed in §60.707 as a product, co-product, by-product, or intermediate.
- g. 40 C.F.R. 61, Subpart V - “National Emission Standards for Equipment Leaks (Fugitive Emissions Sources).” Applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in Facilities, Construction, and Support
- h. 40 C.F.R. 63, Subpart F – “National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry.” 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- i. 40 C.F.R. 63, Subpart G – “National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater.” 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- j. 40 C.F.R. 63, Subpart H - “National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.” 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- k. 40 C.F.R. 63, Subpart DD – “National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations.” Facilities, Construction, and Support (FC&S) does not receive off-site materials as specified in paragraph 40 C.F.R. §63.680(b) and the operations are not one of the waste management operations or recovery operations as specified in 40 C.F.R. §§63.680(a)(2)(i) through (a)(2)(vi).
- l. 40 C.F.R. 63, Subpart YY – “National Emission Standards for Hazardous Air Pollutant for Source Categories: Generic Maximum Achievable Control Technology Standards.” Facilities, Construction, and Support is not one of the source categories and affected sources specified in 40 C.F.R. §§63.1103(a) through (h).
- m. 40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.” Facilities, Construction, and Support does not produce the materials listed in 40 C.F.R. §63.1310.
- n. 40 C.F.R. 63, Subpart EEEE – “National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline).” Facilities, Construction, and Support does not operate an organic liquids distribution (OLD) operation or does not handle material organic liquids as defined in §63.2406.
- o. 40 C.F.R. 63, Subpart PPPP – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.” Facilities, Construction, and Support does not produce an intermediate or final product that meets the definition of a “surface coated” plastic part.

- p. 40 C.F.R. 63, Subpart WWWW - “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” Facilities, Construction, and Support does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.
- q. 40 C.F.R. 63, Subpart ZZZZ – “National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines.” Facilities, Construction, and Support does not have a stationary Reciprocating Internal Combustion Engine (RICE) as defined by 40 C.F.R. §63.6675.
- r. 40 C.F.R. 63, Subpart GGGG – “National Emission Standards for Hazardous Air Pollutants: Site Remediation.” Facilities, Construction, and Support does not conduct site remediation as defined by 40 C.F.R. §63.7957 that meets all three of the conditions specified in 40 C.F.R. §§63.7881(a)(1) through (a)(3).
- s. 40 C.F.R. 63, Subpart HHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” Facilities, Construction, and Support does not produce, blend, or manufacture coatings as part of the manufacturing process.
- t. 40 C.F.R. 63, Subpart NNNN – “National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production.” Facilities, Construction, and Support is not an HCl production facility as defined by 40 C.F.R. §63.9075.
- u. 40 C.F.R. 82, Subpart B - “Protection of Stratospheric Ozone.” Requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing equipment need to be licensed. Facilities, Construction, and Support does not conduct motor vehicle maintenance involving CFCs on site.
- v. 40 C.F.R. 82, Subpart C – “Protection of Stratospheric Ozone.” Bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. Facilities, Construction, and Support does not use, manufacture, nor distribute these materials.
- w. 45CSR10 – “To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.” The “Hotsy” Propane Hot Water Cleaner(V238G03) has a design heat input of 0.4mmBtu/hr. Per 45CSR§10-10.1, any fuel burning unit with a design heat input of less than 10mmBtu/hr is exempt from section 3 and sections 6 through 8 of 45CSR10.
- x. 45CSR16 – “Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60.” The FC&S Area is not subject to any requirements under 40 C.F.R. 60.
- y. 45CSR17 – “To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.” Per 45CSR§17-6.1, the FC&S Area is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.
- z. 45CSR§21-40 – “Other Facilities that Emit Volatile Organic Compound (VOC).” None of the emission sources in FC&S have maximum theoretical emissions of 6 pounds per hour or more and are not subject to the requirements of this section.
- aa. 45CSR§27-4.1 – “To Prevent and Control the Emissions of Toxic Air Pollutants: Fugitive Emissions of Toxic Air Pollutants.” The equipment in the FC&S Area is not in “toxic air pollutant service” as defined by 45CSR§27-2.11 and is not subject to the requirements of 45CSR§27-4.1.

- bb. 40 C.F.R.63, Subpart FFFF – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.” Facilities, Construction, and Support does not manufacture any material or family of materials defined in §63.2435(b)(1)(i) through (v).
- cc. 40 C.F.R. 63, Subpart MMMM – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.” There are no surface coating activities conducted in Facilities, Construction, and Support subject to the requirements of this rule.
- dd. 45CSR§21-19 – “Other Facilities that Emit Volatile Organic Compound (VOC).” The operations of Facilities, Construction, and Support are outside of the SIC grouping to which this section of 45CSR21 applies.

40 C.F.R. 64 – Compliance Assurance Monitoring (CAM) – CAM was addressed in the previous renewals for the existing emission units. CAM is not applicable to the new 200 gallon Diesel Fuel Tank VCFT01 per 40 CFR §§64.2(a)(1) and (a)(2) since it doesn’t have a control device nor emission limits in the permit.

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: April 27, 2020
Ending Date: May 27, 2020

Point of Contact

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

Natalya V. Chertkovsky-Veselova
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41250 • Fax: 304/926-0478
natalya.v.chertkovsky@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)

Not applicable.