

# 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 December 14, 2016.

Permit Number: **R30-10700001-2016**  
Application Received: **January 23, 2019**  
Plant Identification Number: **107-00001**  
Permittee: **DuPont Specialty Products USA, LLC**  
Facility Name: **Nylon Resins Production (Part 5 of 14)**  
Mailing Address: **P.O. Box 2800, Washington, WV 26181-2800**

Permit Action Number: MM05      Revised: November 13, 2019

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Physical Location: Washington, Wood County, West Virginia  
UTM Coordinates: 442.27 km Easting • 4,346.57 km Northing • Zone 17  
Directions: From interstate 77, take exit for Rt-95/Camden Avenue. Proceed west until intersection with Rt-14 then turn right (north). After about ¼ mile turn left onto the Corridor D Bypass entrance. Follow the bypass to the exit just before the bridge. Turn left (south) onto DuPont Rd, Rt-892. Proceed approximately 1 mile to the facility on the right.

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### Facility Description

The purpose of this modification is to allow for sampling of pellets from the Solid Phase Polymerization section of the Melt Process unit (MPW-1).

### Emissions Summary

Pollutant	Change in Potential Emissions, TPY
<b>PM</b>	<b>0.0002</b>
<b>PM<sub>10</sub></b>	<b>0.0002</b>

### Title V Program Applicability Basis

With the proposed changes associated with this modification of the Nylon Area 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:	45CSR30 45CSR7	Operating permit requirement. Particulate matter and opacity limits for manufacturing sources
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State Only: N/A

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

The active permits/consent orders associated with this modification are:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2617K	August 5, 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," which may be downloaded from DAQ's website.

### Determinations and Justifications

The name of the company was changed on February 12, 2019 and was updated within the modification.

After going through the R13 permit determination process through PD19-003, it was decided that there was no permit required for the installation of the improved ventilation system for the sampling port of the Melt Process unit (MPW-1); therefore, there are no changes pertaining to R13.

The improved ventilation system for the SPP section of MPW-1 required addition of a new minor source of emissions, Z805S, and emission point Z805E. This new emission point is subject to an hourly particulate emission limit of 3.4 pph, and an opacity limit of 20% during normal operation, or 40% for no more than 5 minutes in a 60-minute period. It was deemed unnecessary to add emission point Z805E to the list of points subject to monthly visual observation per 6.2.1 due to the infrequency of use and negligible amount of emissions (0.0002TPY of PM).

The changes to the Title V permit as a result of this modification are as follows:

- Changes were made within sections 1.1, 6.1.3, 6.1.4, and 6.2.1 to account for the modification.
- The EPA's contact information was updated within condition 3.5.3.
- Table 1.2 was updated because R13-2617I referenced in this table has been superseded and replaced. The current version is R13-2617K, but the only update to the Title V as a result is the change to Table 1.2.

**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:

Nikki Moats  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext 1225 • Fax: 304/926-0478  
Nikki.B.Moats@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