

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 November 23, 2015.

Permit Number: **R30-10700001-2015**

Application Received: **July 1, 2016**

Plant Identification Number: **03-054-107-00001**

Permittee: **E. I. du Pont de Nemours and Company**

Facility Name: **Washington Works, Specialty Compounding Division (Part 8 of 14)**

Mailing Address: **P.O. Box 2800, Washington, West Virginia 26181-2800**

Permit Action Number: *MM01* Revised: *September 12, 2016*

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 422.27 km Easting • 4,346.57 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

DuPont Washington Works is a multiple business, multiple product line facility that produces plastic resins and their associated feedstock materials. DuPont Washington Works divided the initial Title V Permit Application into fourteen separate business units, each of which received a Title V Permit. This permit is Group 8 of 14, Specialty Compounding Division, which is a segment of DuPont Washington Works that produces polymer blends and mixtures through the use of mixing and extrusion facilities. Specialty Compounding Division takes raw materials, generally in a pellet or powder form, and mixes them together to create high performance plastic blends and polymers for use in automotive, aerospace, and other commercial manufacturing efforts located off-site. SIC: 2821

Emissions Summary

The change from a high efficiency dry paper filter (HEAF) to a wet recirculating venturi scrubber will reduce formaldehyde emissions of for each of the emission units S293-S-02B and S293-S-02D from 0.08 lbs/hr and 0.32 TPY to 0.01 lbs/hr and 0.04 TPY. It will also result in the reduction of Total HAP's for each of these two emission units from 0.11 lbs/hr and 0.45 TPY to 0.04 lbs/hr and 0.17 TPY.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 TPY of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 TPY of aggregate HAPs, therefore E. I. du Pont de Nemours and Company's 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:	45CSR13 45CSR30	Preconstruction permits for minor sources. Operating permit requirement.
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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1533L	July 7, 2016	

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

R13-1533L

Emission Unit S293-S-02B used a high efficiency dry paper filter (HEAF) as a control device. It has been replaced with a wet venturi scrubber. The name of the control device and the year installed has been updated in the equipment table. The control device description for Emission Unit S293-S-02D has been

changed from “Wet Scrubber System” to “Wet Venturi Scrubber” and the year installed date has been changed from 1991 to 2015.

In Condition 4.1.1, the formaldehyde emission limits for emission sources S293-S-02B and S293-S-02D have been changed from 0.08 lbs/hr and 0.32 TPY to 0.01 lbs/hr and 0.04 TPY. The Total HAP’s limit has been changed from 0.11 lbs/hr and 0.45 TPY to 0.04 lbs/hr and 0.17 TPY.

Added Condition 4.1.14 to require a minimum pressure drop across the venturi throat and minimum liquor flow rate to show proper operation of the wet venturi scrubbers.

Added Condition 4.2.2 to require continuous monitoring of the pressure drop across the venturi throat and liquor flow rates to the venturi scrubbers during periods of operations.

The current permit listed in Section 1.2 has been updated to R13-1533L.

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)

Not applicable.