

Permit / Application Information Sheet

Division of Environmental Protection

West Virginia Office of Air Quality

Company:	DuPont Specialty Products USA, LLC	Facility:	Washington Works
Region:	2	Plant ID:	107-00001
Engineer:	Carney, Jonathan	Application #:	13-1849Q
Physical Address:	8480 DuPont Road Building 24- WW Washington WV 26181	Category:	Chemical
County:	Wood	SIC: [2821] CHEMICALS AND ALLIED PRODUCTS - PLASTICS MATERIALS AND RESINS NAICS: [325211] Plastics Material and Resin Manufacturing SIC: [2824] CHEMICALS AND ALLIED PRODUCTS - ORGANIC FIBERS, NONCELLULOSIC NAICS: [325222] Noncellulosic Organic Fiber Manufacturing SIC: [2869] CHEMICALS AND ALLIED PRODUCTS - INDUSTRIAL ORGANIC CHEMICALS, NEC NAICS: [325110] Petrochemical Manufacturing SIC: [2823] CHEMICALS AND ALLIED PRODUCTS - CELLULOSIC MAN-MADE FIBERS NAICS: [325220] Artificial and Synthetic Fibers and Filaments Manufacturing	
Other Parties:	ENV_CONT - Tock, Lawrence 681-484-2980		

Information Needed for Database and AIRS	Regulated Pollutants
No required information is missing.	

Summary from this Permit 13-1849Q	Notes from Database																																							
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Air Programs</td> <td style="width: 25%;">Applicable Regulations</td> <td></td> </tr> <tr> <td>TITLE V</td> <td></td> <td></td> </tr> <tr> <td>Title V/Major</td> <td></td> <td></td> </tr> <tr> <td>Fee Program</td> <td>Fee</td> <td>Application Type</td> </tr> <tr> <td></td> <td>\$3,500.00</td> <td>MODIFICATION</td> </tr> <tr> <td colspan="3">Activity Dates</td> </tr> <tr> <td>APPLICATION RECIEVED</td> <td>05/05/2023</td> <td></td> </tr> <tr> <td>ASSIGNED DATE</td> <td>05/08/2023</td> <td></td> </tr> <tr> <td>APPLICANT PUBLISHED LEGAL AD</td> <td>05/10/2023</td> <td></td> </tr> <tr> <td>APPLICATION FEE PAID</td> <td>05/12/2023</td> <td>via cc</td> </tr> <tr> <td>APPLICATION DEEMED COMPLETE</td> <td>06/02/2023</td> <td></td> </tr> <tr> <td>OAQ PUBLISHED LEGAL AD</td> <td>07/21/2023</td> <td></td> </tr> <tr> <td>PERMIT APPROVED</td> <td>09/27/2023</td> <td></td> </tr> </table>	Air Programs	Applicable Regulations		TITLE V			Title V/Major			Fee Program	Fee	Application Type		\$3,500.00	MODIFICATION	Activity Dates			APPLICATION RECIEVED	05/05/2023		ASSIGNED DATE	05/08/2023		APPLICANT PUBLISHED LEGAL AD	05/10/2023		APPLICATION FEE PAID	05/12/2023	via cc	APPLICATION DEEMED COMPLETE	06/02/2023		OAQ PUBLISHED LEGAL AD	07/21/2023		PERMIT APPROVED	09/27/2023		Permit MM Note: 1)Correct errors in number of allowable capper maintenance jet events for sources GZZ1 and GZZ2 at emissions point DEME; correct emissions at DEME to better reflect current conditions; and correct scrubber liquor flow rate at associated emergency control device DEM-OH. 2)Add emergency flare (DNTRF) for emission sources DMH and DMI, specify short-term monitoring period for Table, 3) Specify monitoring period for short-term limitations in Table 4.1.1 and 4) Administrative updates to eliminate references to comparable fuel regulations (40CFR261.38) and to a condition to section 4.1.12 found in the Title V permit.
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NON-CONFIDENTIAL

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 107-00001
 Company: DuPont Specialty Products USA,
 Printed: 09/27/2023
 Engineer: Carney, Jonathan



Mink, Stephanie R <stephanie.r.mink@wv.gov>

West Virginia Air Quality Permit Issued

1 message

Mink, Stephanie R <stephanie.r.mink@wv.gov>

Thu, Sep 28, 2023 at 9:20 AM

To: "Westbrook, Gregory A" <Greg.A.Westbrook@dupont.com>, "TOCK, LAWRENCE" <Lawrence.Tock@dupont.com>

Cc: Beverly McKeone <beverly.d.mckeone@wv.gov>, Jonathan W Carney <jonathan.w.carney@wv.gov>

Permit Issued

DuPont Specialty Products USA, LLC; Washington Works

Permit Application No. R13-1849Q

Plant ID No. 107-00001

Mr. Westbrook:

Your application for a permit as required by Section 5 of 45CSR13 - "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permit Registrations, and Procedures for Evaluation" **has been approved.**

The attached R13-1849Q is hereby issued pursuant to Subsection 5.7 of 45CSR13. Please be aware of the notification requirements in the permit which pertain to commencement of construction, modification, or relocation activities; startup of operations; and suspension of operations.

As specified in Section 2 of the permit, approval of this permit does not relieve the permittee of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

A copy of the signed permit can be sent via USPS upon request, by contacting Stephanie Mink at (304) 926-0499 ext. 41281.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

Should you have any questions, please contact Jonathan Carney at 304-926-0499 ext. 41247.

--

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281



107-00001_Final PERM_13-1849Q.pdf

654K



Mink, Stephanie R <stephanie.r.mink@wv.gov>

Comments on the Proposed Air Modification Permit Under the Clean Air Act (R13-1849Q) for DuPont Specialty Products, LLC (Facility 107-00001) in Wood Count

1 message

Carney, Jonathan W <jonathan.w.carney@wv.gov>

Thu, Sep 28, 2023 at 8:33 AM

Bcc: stephanie.r.mink@wv.gov

Response to Comments

Company Name: DuPont Specialty Products, LLC

Facility Name: Washington Works - Delrin

Permit Application: R13-1849Q

Plant ID No.: 107-00001.

Dear Commenter,

Please see the response to comments attached to this e-mail regarding DuPont Specialty Products, LLC - Washington Works - Delrin .

Additionally, after consideration of all comments received, both written and delivered orally at a public meeting held on September 12, 2023, the West Virginia Division of Air Quality (DAQ) has made a final determination that the available information continues to indicate that DuPont's proposed modification, in accordance with the filed Permit Modification Application R13-1849Q, is in compliance with all applicable state and federal air quality rules and regulations. Therefore, on September 26, 2023, the DAQ, pursuant to §45-13-5.7 issued Permit Number R13-1849Q to DuPont Specialty Products, LLC for the modification and operation of a chemical process facility located in Wood County, WV. Documents related to this permitting action, including the Engineering Evaluation, Final Permit, and other documents/correspondence (under the labels "IPR and IPR2"), shall be made available at the following location soon (both on the page linked below under the "Popular Searches" tab and on the Application Xtender database):

<https://dep.wv.gov/daq/permitting/Pages/NSR-Permit-Application.aspx>


If you would like to request a hard copy of any of these documents mailed to you or if you have any questions, please contact me at (304) 926-0499 x41247 or Ms. Stephanie Mink at (304) 926-0499 x41281.

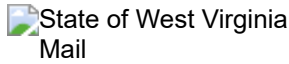
Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

Sincerely

Jonathan Carney

--
Jonathan Carney, P.E.
WV Department of Environmental Protection
Division of Air Quality
NSR/Title V Air Permitting
601 57th St SE
Charleston, WV 25304
(304) 926-0499 ext. 41247
Jonathan.W.Carney@wv.gov

 R13-1849Q_9-27-2023 RTC.pdf
237K



Carney, Jonathan W <jonathan.w.carney@wv.gov>

DuPont Specialty Products Comments

1 message

Cynthia Palmer <CPalmer@momscleanairforce.org>

Tue, Sep 19, 2023 at 4:29 PM

To: "DEP.Comments@wv.gov" <DEP.Comments@wv.gov>, "Jonathan.W.Carney@wv.gov" <Jonathan.W.Carney@wv.gov>

Dear Mr. Carney and West Virginia DEP Staff,

Attached please find our comment letter regarding the DuPont Specialty Products' application for permit modification.

Thank you kindly for this opportunity to provide our input.

Best regards,

Cynthia Palmer, Senior Analyst, Petrochemicals, Moms Clean Air Force

Lucia Valentine, Moms Clean Air Force West Virginia

Eric Engle, Board President, Mid-Ohio Valley Climate Action

Frank Rocchio, Founder, Ohio Valley Environmental Advocates

Cheryl Johncox, Regional Coordinator, People Over Petro Coalition

Gary Zuckett, West Virginia Citizen Action Group

Linda Frame, West Virginia Environmental Council

Angie Rosser, Executive Director, West Virginia Rivers



Comment letter on DuPont-Chemours Washington Works 9-19-2023.pdf

99K

September 19, 2023

Comments to the West Virginia Department of Environmental Protection
Submitted via email at DEP.Comments@wv.gov and Jonathan.W.Carney@wv.gov
Subject: DuPont Specialty Products Comments

Permit number: R13-1849Q
Facility ID: 107-00001
DuPont Specialty Products, USA, LLC; Washington Works
Application for Permit Modification
<https://dep.wv.gov/daq/permitting/Pages/NSR-Permit-Applications.aspx>

Jonathan Carney
Division of Air Quality
West Virginia Department of Environmental Protection
601 57th St. SE
Charleston, WV 25304

Dear Mr. Carney:

This letter concerns the Washington Works facility in Washington, West Virginia, where the DuPont and Chemours Corporation manufactures plastics polymers from formaldehyde and other toxic chemicals. The facility is seeking a modification to increase its permitted emissions of health-harming air pollution.

Specifically, DuPont proposes to pollute the community surrounding its Wood County, WV acetal resin polymerization plant with additional carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds. Moms Clean Air Force West Virginia, Mid-Ohio Valley Climate Action, Ohio Valley Environmental Advocates, People Over Petro Coalition, West Virginia Citizen Action Group, West Virginia Environmental Council, and West Virginia Rivers urge the West Virginia Department of Environmental Protection to deny DuPont Washington Works' permit request due to a long history of violating clean air and clean water laws; failure to utilize safer technologies; and the injustice of adding additional pollution to an already overburdened community, putting public health at risk.

The West Virginia Department of Environmental Protection is charged with deciding whether to grant DuPont's requested permit modification. You have reached out to the public to provide comments on the air quality issues relevant to this determination. We appreciate this opportunity to share our observations. In the pages that follow, we will explain why WV DEP should reverse the recommendation cited in your Engineering Evaluation of July 17, 2023 and disallow the Modification of Permit R13-1849Q.

A HISTORY OF HARM AND DISHONESTY

This facility has a long history of pollution violations which have impacted the health of workers and community members.

DuPont Washington Works manufactured Teflon (made from the forever chemical PFOA, also known as C8) at this very facility beginning in 1951. Despite awareness of PFOA's toxicity, and findings of blood- and kidney- cancers and reproductive harm in its employees, the Washington Works facility chose not to reduce its emissions nor to inform the public and the Environmental Protection Agency. In addition to the heavy carcinogenic exposure to its workforce, the DuPont Washington Works facility released PFOA into local waterways, ultimately causing widespread contamination across the Ohio River Valley. The C8 Science Panel linked PFOA exposure to ulcerative colitis, pregnancy-induced hypertension, thyroid disease, testicular cancer, kidney cancer, and other harms. <http://www.c8sciencepanel.org/>

Given this backdrop, it may come as no surprise that our organizations and many residents of Wood County and beyond are troubled by this facility's present plans and permit application. We recognize the serious consequences tied to these permits as DuPont-Chemours Washington Works seeks permission to *increase* its emissions of toxic pollutants into our air. The community has already suffered enough. We have analyzed the data and conclude that DuPont's request is not acceptable.

REGULATORY OVERSIGHT TO PROTECT HUMAN HEALTH AND THE ENVIRONMENT

In your presentation of September 12, 2023, you stated that the WV DEP would issue a permit unless it determined that the proposed modification would violate an air emissions standard or would be inconsistent with the intent or purpose of West Virginia laws or Code. Like you said, those laws aim to protect human health and the environment. We contend that the proposed modification -- allowing the company more petrochemical flaring and more toxic pollution in Wood County -- is inconsistent with that intent.

It is a well-understood tactic for petrochemical facilities to expand their operations in a piecemeal fashion, inching up the emissions numbers little by little. Such a strategy of requesting permits for small modifications is a classic way that petrochemical companies expand their operations without public notice. This is precisely what is taking place at the DuPont-Chemours Washington Works facility.

DuPont's permit application proposes to add a flare to burn off chemicals during upset events, and to increase the number of vapor releases allowed during periodic maintenance of the "copper jets." WV DEP states that the following changes in potential emissions would be authorized by this permit action: Increase Carbon Monoxide, 0.34 tons per year (TPY); Increase

Nitrogen Oxides, 0.11 TPY; Increase Particulate Matter 0.01 TPY; Increase Sulfur Dioxide, 0.01 TPY; Increase Volatile Organic Compounds, 0.63 TPY; Decrease Hexane, 0.02 TPY; Decrease Total Hazardous Air Pollutants, 0.04 TPY.

PETROCHEMICAL POLLUTION FROM THE WASHINGTON WORKS FACILITY

It is important to look at the bigger picture of what this plastics factory, DuPont Washington Works, and their spinoff company Chemours Washington Works, are emitting in Wood County and surrounding communities.

The EPA AirToxScreen Mapping Tool offers an initial glimpse into the large amount of toxic, flammable, and explosive chemicals in the air surrounding the DuPont Washington Works and Chemours Washington Works facility. **We note that since both entities share the same physical location, the artificial divide between DuPont and Chemours is irrelevant.**

AirToxScreen's most recent data (2019) indicate, for example, that the combined DuPont and Chemours Washington Works facilities are emitting into the air:

6.5 tons of toluene per year

5.3 tons of methanol per year

7.8 tons of hydrogen fluoride per year

3.7 tons of formaldehyde per year

And many other toxic chemicals such as benzene, xylene, hydrochloric acid, hexane, cyanide, glycol ethers, lead, mercury, and biphenyl.

<https://experience.arcgis.com/experience/a2eea9c204004158a85a18371d6883bc/page/2019-Cancer-Risk/>

The Toxic Release Inventory offers a deeper dive into the chemicals released by the Washington Works facility, including such carcinogens as tetrafluoroethylene, formaldehyde, dichloromethane, and dioxin.

<https://enviro.epa.gov/facts/tri/ef-facilities/#/Chemical/26180DPNTWDUPON>

<https://enviro.epa.gov/facts/tri/ef-facilities/#/Chemical/2618WCHMRS848DU>

In total, the Toxics Release Inventory for 2022 for DuPont Polymer Products reports 11,847.99 lbs of air toxics emissions in 2022, with a majority constituting formaldehyde (7,037.80 lbs). The TRI air toxics emissions for 2022 for Chemours Company at the exact same location is 166,513.02 lbs. **In other words, at this singular location the toxic air emissions total 178,361.01 lbs in 2022.**

<https://echo.epa.gov/air-pollutant-report?fid=110000586081>

<https://echo.epa.gov/air-pollutant-report?fid=110071367964>

HEALTH EFFECTS

The following are examples of health effects from some of the harmful chemicals emitted by the Washington Works facility:

Hydrogen fluoride (HF) presents an extraordinary hazard to the community. HF vapor clouds can sicken or kill workers and residents for miles around. The Toxics Release Inventory for DuPont Washington Works does not include the current amounts of hydrogen fluoride released, but that data gap only tells us that the amount used is less than the reporting threshold of 25,000 lbs. The TRI data for Chemours Washington Works list 1,803 lbs released in stack emissions and 3 in fugitive emissions/leaks.

https://enviro.epa.gov/enviro/tri_formr_partone_v2.get_thisone?rpt_year=2022&dcn_num=132221350263&ban_flag=Y

But the total combined amount from these intertwined companies polluting from the same location remains unclear. The 2019 figure from the EPA AirToxScreen translates to an annual release of 17,196.1 lbs of hydrogen fluoride.

It appears that the Washington Works facility continues to expose workers and Wood County residents to the extreme risks of hydrogen fluoride even though there are safer alternatives available that have been successfully implemented at other facilities.

Formaldehyde is a toxic, flammable gas and a VOC (volatile organic compound). It is classified as a known human carcinogen. This unequivocal assessment is based on evidence it can cause nasopharyngeal cancer and leukemia. Any increase in formaldehyde emissions adds to the danger that residents are facing from the Washington Works facility.

The Toxics Release Inventory reports an estimated 7,037.80 lbs (DuPont) plus 1,161 lbs (Chemours) of formaldehyde emissions to the air in 2022. In total, more than 870 lbs were released in fugitive or non-point air emissions (leaks) and another 7,329 lbs in stack emissions.

https://enviro.epa.gov/enviro/tri_formr_partone_v2.get_thisone?rpt_year=2022&dcn_num=1322220941759&ban_flag=Y

https://enviro.epa.gov/enviro/tri_formr_partone_v2.get_thisone?rpt_year=2022&dcn_num=132221350376&ban_flag=Y

Toluene is a carcinogenic, mutagenic, repro-toxic chemical. It is a likely teratogen, meaning that it causes malformation in the unborn fetus. It harms the female reproductive system and can cause pregnancy loss. It is associated with nerve damage, liver damage, and kidney damage. Toluene may lead to degeneration of parts of the brain including the cerebellum and hippocampus.

The Toxics Release Inventory for 2022 records an estimated 345 lbs of toluene in fugitive or non-point air emissions in addition to 2,719 lbs (DuPont) and 12,896.5 lbs (Chemours) of toluene in stack emissions.

https://enviro.epa.gov/enviro/tri_formr_v2.fac_list?rptyear=2022&facopt=dcn&fvalue=1322220941999&fac_search=fac_beginning
https://enviro.epa.gov/enviro/tri_formr_partone_v2.get_thisone?rpt_year=2022&dcn_num=1322221350299&ban_flag=Y

CUMULATIVE IMPACTS

While each toxic emission from the Washington Works facility is harmful, the cumulative effects of all these pollutants together may be far more damaging. And the communities in and surrounding Wood County are plagued by a heavy concentration of petrochemical polluters, including the Kraton Polymers facility, source of 1,3-butadiene, nickel compounds, and other toxic emissions, and the Orion Engineered Carbons facility with its large emissions of hydrogen cyanide and carbon disulfide. People who breathe the air in their neighborhoods face the cumulative risk from multiple simultaneous toxic pollution sources. We urge the WV DEP to coordinate with Ohio regulators to reduce the pollution burden on these already overburdened communities.

<https://experience.arcgis.com/experience/a2eea9c204004158a85a18371d6883bc>

Examining the one-mile radius surrounding the Washington Works facility using the Environmental Justice Screen Supplemental Index, this location ranks in the 86th percent of the United States in terms of toxic releases to air, 82 percentile for proximity to Risk Management Facilities, and 82 percentile for wastewater discharge.

https://echo.epa.gov/detailed-facility-report?fid=110071367965&ej_type=sup&ej_compare=US

Wood County, in which the Washington Works Facility is located, ranks in the 96th percentile in the US for toxic releases to air; the 93rd for proximity to Risk Management Program industrial facilities; and the 84th percentile in wastewater discharge.

https://ejscreen.epa.gov/mapper/mobile/EJSCREEN_mobile.aspx?geometry={%22x%22:-81.66999,%22y%22:39.26944,%22spatialReference%22:{%22wkid%22:4326}}&unit=9035&areatype=&areaid=&basemap=hybrid&distance=1

A HIGH-PRIORITY VIOLATOR

EPA's Enforcement and Compliance History Online (ECHO) database offers data on the extent to which industrial polluters are violating laws meant to protect public health and the environment. Due to its complex ownership structure as "DuPont" and as "Chemours," the facility at 8480 Dupont Road in Washington, West Virginia has three separate entries under different names. For those who must live and work around the Washington Works facility, including the children whose lungs and other organs are still developing, this corporate ownership status makes little difference. Re-naming parts of an industrial polluter must not be used as a way to shield these companies from responsibility.

The Washington Works facility, under the name of Chemours, has been a Clean Air Act High Priority Violator for the past four quarters. Its “high priority” air pollution violations involve chlorine, mercury, total hazardous air pollutants (HAPS), carbon monoxide, volatile organic compounds (VOCS), visible emissions, particulate matter < 10 UM, total particulate matter, hydrochloric acid, nitrogen oxides, and sulfur dioxide.

The facility also has ongoing “Significant Violations” under the Clean Water Act, including the past 12 quarters in Significant Noncompliance (every single quarter for the past 3 years). The Washington Works facility has had 7 formal enforcement actions over the past 5 years. In addition, the facility has recent RCRA (waste) violations.

<https://echo.epa.gov/detailed-facility-report?fid=110071367964>

This is not a facility that the West Virginia Department of Environmental Protection should be rewarding with additional capacity to pollute. We are urging the WV DEP to require the Washington Works facility to desist from violating federal air pollution laws, not to increase the allowable emissions.

PLANS TO POLLUTE MORE IN WOOD COUNTY

The Chemours/DuPont facility proposes to add an additional flare to burn off chemicals during upset events, and to increase the number of vapor releases allowed during periodic maintenance of its “capper jets.” Instead of polluting more, we recommend that the Washington Works facility take steps to actually protect people from its dangerous and harmful operations. Rather than flaring more, as they propose in their permit modification, the facility could upgrade their flare efficiency, and – even better – could commit to almost entirely flare-free operations.

Chemours/DuPont uses flares and “jets” for routine management of waste gases, resulting in significant emissions of formaldehyde and other pollutants. Most flares cannot be readily monitored to verify their emissions. Flares also produce additional highly-toxic pollutants as an unavoidable result of the often poor and variable combustion in the open flames. Far from protecting the public as Chemours/DuPont suggests, flaring is itself a source of significant pollution. Open flaring for routine waste gases simply needs to stop. Since flares are so highly polluting, flares should only be used in true emergency situations, and only as a last resort. More efficient controls such as thermal oxidizers are already used at some facilities in place of flaring. There are far better techniques for routine management of waste gases, including vapor recovery systems coupled with waste gas storage systems.

In addition, the Washington Works facility could dramatically upgrade its leak detection and repair technology, for example by implementing leakless or low-leak valves, optical gas imaging, or leak detection sensor networks. It could commit to discontinue use of startup, shutdown, and malfunction loopholes. And it could implement robust fence-line monitoring as called for in the EPA proposed rule for synthetic organic chemical plants and for polymers and resins facilities.

The Washington Works facility is on the EPA list for coverage by the new Chemical Manufacturing Rules. The 200 facilities covered by these proposed standards are among the most polluting industrial plants in the nation.

<https://www.federalregister.gov/documents/2023/04/25/2023-07188/new-source-performance-standards-for-the-synthetic-organic-chemical-manufacturing-industry-and>

Instead of acknowledging the need to better protect the health of people in the community, the facility is already pushing back on the EPA proposal. DuPont and Chemours seem to insist that they can harm Wood County as much as they please.

As reported in the Charleston Gazette-Mail on May 8, 2023:

Chemours said the rule wouldn't apply to operating units at its Washington Works site. The company cited state Department of Environmental Protection-issued operating air permits for the Washington Works site that shield it from certain federal regulations, including some that apply to synthetic organic chemical manufacturers.

Chemours spokesperson Lisa Randall said the company's initial review indicated the rule would apply to a DuPont site at Washington Works.

DuPont spokesperson Daniel Turner said DuPont is reviewing the proposed rule to determine if there would be "any potential impact to our operations at the site."
https://www.wvgazette.com/news/energy_and_environment/epa-identifies-which-two-wv-facilities-face-fenceline-monitoring-requirements-under-proposed-chemical-emissions-rule/article_8715fa45-4f93-50b3-8890-f44c9ea0c6a4.html

DuPont/Chemours Washington Works is a known serial violator of air and water pollution laws in Wood County. Communities surrounding this facility deserve to live with less pollution, not more. We urge the WV DEP to protect children and families across West Virginia from the dangerous cumulative air pollution impacts from this facility.

Please deny the Modification of Permit R13-1849Q.

Thank you for your consideration.

Sincerely,

Lucia Valentine, Moms Clean Air Force West Virginia

Eric Engle, Board President, Mid-Ohio Valley Climate Action

Frank Rocchio, Founder, Ohio Valley Environmental Advocates (OVEA)

Cheryl Johncox, Regional Coordinator, People Over Petro Coalition

Gary Zuckett, West Virginia Citizen Action Group

Linda Frame, West Virginia Environmental Council

Angie Rosser, Executive Director, West Virginia Rivers

Cynthia Palmer, JD, MPH, Senior Analyst, Petrochemicals, Moms Clean Air Force

CPalmer@MomsCleanAirForce.org



Fair Shake
Environmental Legal Services

6425 Living Place, Suite 200
Pittsburgh, PA 15206
www.FairShake-ELS.org
(412) 664-5811

September 12, 2023

WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

Submitted to: Jonathan.W.Carney@wv.gov

Fair Shake Environmental Legal Services is a nonprofit environmental law firm and community democracy organization working for environmental justice throughout Ohio, Pennsylvania, and West Virginia. We appreciate the opportunity to submit the following comments concerning the proposed air quality permit application R13-1849Q (“permit modification”) for DuPont Specialty Products USA, LLC in Wood County, WV.

The permit modification should be denied. Low-income resident would bear a disproportionate share of the risks or consequences of the environmental pollution caused by this permit because of their economic status. In 2003, The West Virginia DEP created the Environmental Equity Policy, stating that “the West Virginia Department of Environmental Protection will, within its authority, ensure that no segment of the population, because of its status as a low-income or minority community or any other fact so relating to its racial or economic makeup, bear a disproportionate share of the risks and consequences of environmental pollution or be denied equal access to environmental benefits” ([West Virginia Department of Environmental Protection Environmental Equity Policy](#)). The permit modification fails to take into account the cumulative environmental and health related impacts that low-income residents will suffer, as contemplated by the Environmental Equity Policy. Because the permit modification fails to comply with the Environmental Equity Policy, fails to adequately

Using the EPA’s [EJ Screening Tool](#), it is clear to see that this facility is in a census tract where residents are already experiencing inequitable share of human health and environmental risk. Specifically:

- PM2.5: higher burden than 91% of other census tracts across the state
- Toxic Releases to Air: higher burden than 85% of other census tracts across the state

WV EPA states that high levels of PM2.5 can contribute to numerous health impacts, including “increased symptoms, hospital admissions and emergency room visits for people with heart and lung disease, to premature death in people with heart or lung disease” ([WV DEP PM2.5 National Ambient Air Quality Standards](#), page 1.). Unfortunately, these health disparities are already felt where this facility is being proposed, and, according to the EJ Screening Tool, low-income residents



living across the street from this facility and in the neighboring census tract face disproportionately higher rates of asthma and heart disease.

This facility is already permitted to emit PM2.5, VOCs, NOx, SO2, and CO, in addition to other emissions, and DuPont is requesting to increase their emissions of these compounds. This would add more air pollutants into the community and would further exacerbate poor air quality for residents that are already suffering the physical health impacts that poor air quality brings.

As part of its mission, Fair Shake provides civic education and engagement around environmental justice issues in Wood County. Over the past year, during engagement activities with approximately 300 residents in Wood County, we heard residents express their vision for a community with clean air and lower pollution in which kids can play outside without being harmed. The DuPont facility does not align with the community's vision for their future. The WV DEP's Environmental Equity Policy dictates that communities have meaningful involvement in decisions made about the environment in which they live, learn, and work. We ask the West Virginia Department of Environmental Protection to listen to and trust community members and residents who live near this facility.

For at least the reasons above, the air permit modification for DuPont should be denied. However, if West Virginia DEP chooses to issue the permit despite the concerns raised in this comment letter, we request that that the WV DEP take the following actions to mitigate impacts and protect the health of surrounding communities:

- 1) Make records and monitoring data easily available to the public in a format that can be understood by the average citizen, including in times of any incidents or breaches of protocol;
- 2) Mandate additional control technologies to minimize cumulative community health impacts;
- 3) Develop a well-communicated emergency response plan in cooperation with local emergency services to be employed in the event of an accident, with special attention paid to the needs of disabled residents;
- 4) Conduct a thorough environmental justice and cumulative impact analysis to ensure impacts from the facility to not disproportionately fall on environmental justice communities and consult with the community about what additional measures will be implemented to protect vulnerable residents.

If these reasonable protective steps cannot be included as enforceable permit terms, then the company should be urged to enter into a community benefit agreement to ensure that emissions from this proposed installation do not add to the disproportionate environmental burdens of the local environmental justice community.

We appreciate the opportunity to comment on this permit.

Signed,

Meagan Niebler

Meagan Niebler
Community Democracy Program Manager
Fair Shake Environmental Legal Services
412-664-5811



Fair Shake

Environmental Legal Services

6425 Living Place, Suite 200
Pittsburgh, PA 15206
www.FairShake-ELS.org
(412) 664-5811

mniebler@fairshake-els.org



Carney, Jonathan W <jonathan.w.carney@wv.gov>

Re: WV Draft Permit R13-1849Q for DuPont Specialty Products USA, LLC; Washington Works

1 message

TOCK, LAWRENCE <Lawrence.Tock@dupont.com>

Thu, Sep 14, 2023 at 12:58 PM

To: Jonathan W Carney <jonathan.w.carney@wv.gov>

Cc: "Ankrom, Josh" <josh.ankrom@dupont.com>, "GILBERT, KEVIN L" <Kevin.L.Gilbert-1@dupont.com>, "Westbrook, Gregory A" <Greg.A.Westbrook@dupont.com>

Mr. Carney,

Within the time frame allotted as discussed at the recent public meeting as well as per our discussion when you recently visited the site to review the systems to be affected by the proposed permit, I am resending (see below) my earlier e-mail from July 31, 2023 which we reviewed.

We were disappointed to be informed that WV DEP is not willing to remove the requirement to require at least one pilot light at all times other than for maintenance. To date, the added layer of protection that will be provided by the proposed flare is not required by any federal or WV regulation, and specifically not 40 CFR Part 63, Subpart SS. There is no legal requirement to add this flare. This was noted during the public meeting. It is being installed voluntarily by DuPont, despite over 50 years of safe operation without it due to the existing layers of protection. To add a requirement to the permit that would make it a deviation if future conditions beyond our control result in a standby emergency flare without a pilot light (despite those existing layers of protection), a condition essentially matching current conditions without the flare, for which neither condition otherwise has an applicable regulation from which to deviate, discourages a business from trying to be a good neighbor. DuPont does not believe that to be the intention of the WVDEP. Regardless, if WV DEP is unwilling to make the proposed change per the text presented in the earlier e-mail, then DuPont suggests condition 4.1.8.2.2.b. be otherwise modified. Please consider, as operation of the flare is not required for the production process or by regulation, and as conditions 4.1.8.2.2 would require its operation, then as currently written condition 4.1.8.2.2 could be interpreted to prevent, without more deviations, its removal (unless removal is considered maintenance). Hypothetically, if either a future alternative emission limit (AEL) is to be applied in lieu of condition 4.1.8.2.2 or the flare is determined to be no longer necessary, particularly if these permit conditions are considered to be part of the WV SIP as approved by U.S. EPA, it could be interpreted as a deviation to turn off the pilots before permanently shutting down the flare without a permit modification. Thus, to ensure operational flexibility, including the existing requirements for the same in the permit, DuPont proposes the additional condition 4.1.8.2.2.c. through e. be added to the permit. Note, if the disruption of the gas flow to the flare is a malfunction of the flare, the flare would still meet its proposed emission limits, but not condition 4.1.8.2.2 of the permit. Thus, such a malfunction of the flare should not require an AEL, unless per a circular logic reference 4.1.8.2.2 is to be an AEL (i.e.: there is no deviation of a standard except this condition is essentially a standard). With the above in mind, **and unless any suggested language modifying the permit at this time will further delay issuance of the permit**, DuPont proposes the following language as a compromise (changes are highlighted). DuPont still would prefer that the suggested changes from the July 31, 2023 e-mail be applied which are less complicated than

those suggested immediately below and which accomplish the same result. No permittee should have to potentially suffer a deviation for a voluntary action to improve safety and which is not required by any regulation.

4.1.8.2.2. The flare, DNTFF, the permittee shall maintain at least one pilot light in operation while either emission unit DMH or DMI is in service, except:

- a. for periods of maintenance to the flare and associated equipment,*
- b. for periods of disruption in the supply of natural gas beyond the reasonable control of the permittee,*
- c. when both sources DMH and DMI are isolated (i.e.: locked out) from the production process,*
- d. when only insignificant amounts of material are present in both emission sources DMH and DMI, and*
- e. after demolition and combined with downtime for the associated removal from service of the flare.*

This flare shall serve only to abate emissions from two tanks (sources DMH and DMI) during an emergency event, when one or both tanks vent through their emergency relief vents. [45CSR13-5.10 11 State-Only Enforceable Requirement]

Note, DuPont believes the reference to “45CSR13-5-10” should be “45CSR13-5-11”, as modified above.

As also reviewed during your visit, the reference to the amount of HAP emissions in the Engineering Evaluation noted in the previous e-mail and to section 2.12 should be corrected.

We thank you for taking the time to inspect the plant and considering these comments with regard to the proposed modification of the permit.

Lawrence Tock

Delrin® Environmental Coordinator

DuPont Washington Works



From: TOCK, LAWRENCE
Sent: Monday, July 31, 2023 4:02 PM
To: Jonathan W Carney <jonathan.w.carney@wv.gov>
Cc: Ankrom, Josh <josh.ankrom@dupont.com>; GILBERT, KEVIN L <Kevin.L.Gilbert-1@dupont.com>
Subject: FW: [EXTERNAL] CORRECTION: Re: WV Draft Permit R13-1849Q for DuPont Specialty Products USA, LLC; Washington Works

Hello Mr. Carney,

In regard to the public notice of the proposed permit R13-1849Q, DuPont has the following comments.

If section 2.12 is being changed to "Reserved", then the draft permit still has two paragraphs 2.12.4 and 2.12.5 under what was section 2.12 that seem to have been inadvertently retained.

I also noted the change in THAP emissions for emission point DEME in the Engineering Evaluation/Fact Sheet listed increases of 2.07 lb/hr and 2.21 TPY. I believe this is incorrect. THAPs for DEME decrease by 1.69 lb/hr and 0.04 TPY per my calculations and as presented in the application on page 57 of 303 (shown below). The proposed limits in the permit are otherwise correct.

Attachment N

NET INCREASE / DECREASE IN PERMIT LIMITATIONS

Source	New	PPH	TPY
DNTFF	PM	0.01	0.01
	VOC	0.17	0.72
	NO _x	0.03	0.11
	SO ₂	0.01	0.01
	CO	0.08	0.34
DMH/DMI	Increase/Decrease		
	VOC	-4.00	-0.09
	HAPs	-1.69	-0.04
	CH ₂ O	0.03	0.00
	Hexane	-1.50	-0.02
	Toluene	-0.22	0.00
	Net Increase/Decrease		
	PM	0.01	0.01
	VOC	-3.83	0.63
	NO _x	0.03	0.11
	SO ₂	0.01	0.01
	CO	0.08	0.34
	HAPs	-1.69	-0.04
	CH ₂ O	0.03	0.00
	Hexane	-1.5	-0.02
	Toluene	-0.22	0.00

Page 57 of 303
05/09/23

Upon further internal review, DuPont believes section 4.1.8.2.2 should be revised to state that the flare, including its pilots, are only necessary to be operated for an emergency. The flare is being voluntarily installed and there are no specific regulations that specifically require this flare to be operated. That is to say, there is no air pollution control emission standard to be exceeded if the flare’s pilots are not operating. DuPont would be willing to accept the following change we discussed, if acceptable to the DAQ after its further review:

4.1.8.2.2. The flare, DNTFF, ~~the permittee shall maintain at least one pilot light in operation while either emission unit DMH or DMI is in service, except for periods of maintenance to the flare and associated equipment. This flare~~ shall serve only to abate emissions from two tanks (sources DMH and DMI) during an emergency event, when one or both tanks vent through their emergency relief vents.

Thank you for taking the time to discuss the items listed above. We look forward to starting the installation of this flare as soon as possible after final issuance of the permit R13-1849Q.

Sincerely,

Lawrence Tock

Delrin® Environmental Coordinator

DuPont Washington Works



From: Mink, Stephanie R <stephanie.r.mink@wv.gov>

Sent: Friday, July 21, 2023 2:53 PM

To: Supplee, Gwendolyn <supplee.gwendolyn@epa.gov>; Weinelt.Eva@epa.gov;
leary.justin@epa.gov; Westbrook, Gregory A <Greg.A.Westbrook@dupont.com>; TOCK,
LAWRENCE <Lawrence.Tock@dupont.com>

Cc: Crowder, Laura M <Laura.M.Crowder@wv.gov>; McKeone, Beverly D
<Beverly.D.Mckeone@wv.gov>; McCumbers, Carrie <Carrie.McCumbers@wv.gov>; Nicole D
Ernest <nicole.d.ernest@wv.gov>; Jonathan W Carney <jonathan.w.carney@wv.gov>; Johnson,
Rebecca H <Rebecca.H.Johnson@wv.gov>; Angela K Chestnut <angela.k.chestnut@wv.gov>

Subject: [EXTERNAL] CORRECTION: Re: WV Draft Permit R13-1849Q for DuPont Specialty Products USA, LLC; Washington Works

Everyone: I have just been informed by the newspaper that, due to an extended power outage in the Parkersburg area, only a limited number of newspapers containing the legal notice we published today were distributed. The legal notice appeared

ZjQcmQRYFpfpBannerStart

This Message is from an External Sender

Use caution opening links or attachments

ZjQcmQRYFpfpBannerEnd

Everyone:

I have just been informed by the newspaper that, due to an extended power outage in the Parkersburg area, only a limited number of newspapers containing the legal notice we published today were distributed. The legal notice appeared in the online edition today but the newspaper has agreed to republish the notice on Tuesday, July 25, 2023 to ensure that the public has a thorough opportunity to be informed. The thirty day comment period will now end on Thursday, August 24, 2023. For your convenience I have attached the Draft Permit R13-1849Q, Engineering Evaluation and a revised Public Notice.

Should you have any questions or comments, please contact the permit writer, Jonathan Carney, at 304-926-0499, x 41247 or Jonathan.W.Carney@wv.gov. I apologize for the delay.

Thank you

Stephanie

On Wed, Jul 19, 2023 at 10:23 AM Mink, Stephanie R <stephanie.r.mink@wv.gov> wrote:

Please find attached the Draft Permit R13-1849Q, Engineering Evaluation and Public Notice for DuPont Specialty Products USA, LLC's Washington Works facility located in Wood County.

The public notice will be published in the *Parkersburg News and Sentinel* on Friday, July 21, 2023 and the thirty day comment period will end on Monday, August 21, 2023.

Should you have any questions or comments, please contact the permit writer, Jonathan Carney, at 304-926-0499, x 41247 or Jonathan.W.Carney@wv.gov.

--

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

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Francais Deutsch Italiano Espanol Portugues Japanese Chinese Korean

<https://www.dupont.com/email-disclaimer.html>



Carney, Jonathan W <jonathan.w.carney@wv.gov>

DuPont Specialty Products USA, LLC, R13-1849Q Comments

1 message

Meagan Niebler <mniebler@fairshake-els.org>

Tue, Sep 12, 2023 at 7:57 AM

To: "Jonathan.W.Carney@wv.gov" <Jonathan.W.Carney@wv.gov>

Dear Mr. Carney,

We appreciate the opportunity to submit the following comments concerning DuPont Specialty Products USA, LLC, R13-1849Q in Wood County, WV.

Please see the attached comment for your review and records.

Thank you,

Meagan Niebler

Meagan Niebler, MPH (she/her)

Community Democracy Program Manager

Fair Shake Environmental Legal Services

412-664-5811

<https://www.fairshake-els.org>

mniebler@fairshake-els.org

 **Fair Shake comments proposed air permit modification R13-1849Q.pdf**
181K



Carney, Jonathan W <jonathan.w.carney@wv.gov>

DuPont Specialty Product Public Meeting Notice

1 message

Carney, Jonathan W <jonathan.w.carney@wv.gov>
To: "TOCK, LAWRENCE" <Lawrence.Tock@dupont.com>

Thu, Aug 31, 2023 at 8:45 AM

Hello Larry,

Attached is the Notice for the upcoming public meeting.

Sincerely,
Jonathan Carney

--

Jonathan Carney, P.E.
WV Department of Environmental Protection
Division of Air Quality
NSR/Title V Air Permitting
601 57th St SE
Charleston, WV 25304
(304) 926-0499 ext. 41247
Jonathan.W.Carney@wv.gov

 **DuPont Specialty Public Notice 3.pdf**
66K



Carney, Jonathan W <jonathan.w.carney@wv.gov>

WV DAQ Public Meeting DuPont Specialty Products, LLC - Washington Works

1 message

Carney, Jonathan W <jonathan.w.carney@wv.gov>

Wed, Aug 30, 2023 at 11:36 AM

Bcc: ericengle85@yahoo.com, bennphil@hotmail.com, cibermage@gmail.com,
dawnweidner@gmail.com, madisonbrown34@hotmail.com, stonegarden@suddenlink.net,
randi.pokladnik@gmail.com, cwtaylor50@gmail.com

Company Name: DuPont Specialty Products, LLC
Facility Name: Washington Works
Permit Application: R13-1849Q
Plant ID No.: 107-00001

Dear Commenter,

This message is in response to your request for a public hearing. Please see the attached notice concerning the scheduled public meeting/hearing. The written comment period has been extended and written comments will be received until 5:00 P.M. Tuesday, September 19, 2023.

Sincerely,

Jonathan Carney

--

Jonathan Carney, P.E.
WV Department of Environmental Protection
Division of Air Quality
NSR/Title V Air Permitting
601 57th St SE
Charleston, WV 25304
(304) 926-0499 ext. 41247
Jonathan.W.Carney@wv.gov

 **DuPont Specialty Public Notice (2).pdf**
71K

Classified/Legal Advertising Invoice

Parkersburg News and Sentinel

519 Juliana St Parkersburg WV 26101
PO Box 1787 Parkersburg WV 26102

(304) 485-1891



**WV DEPT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57TH STREET SE
CHARLESTON, WV**

08/24/2023 2:33:30PM

25304

No: 147894

Phone: 304 926-3727

Ad No 147894	Customer No: L00050	Start Date 08-30-2023	Stop Date 08-30-2023	Category: Legals		Classification: Legals			
Order No	Rate: LE	Lines: 59	Words: 447	Inches: 5.78	Cost 71.60	Payments .00	Balance 71.60		
Publications ... Runs News Legals ... 1 WV Online Legals PKB ... 1		Solicitor: DW	Origin: 10	Sales Rep: 120	Credit Card	Credit Card Number	Card Expire		
		<table border="1"> <tr> <th align="center">Identifier</th> </tr> <tr> <td> DEP to Hold Public Meeting and Extend Public Period The West Virginia Department of Environmental Protection's Division of Air Quality (DAQ) will hold a virtual </td> </tr> </table>						Identifier	DEP to Hold Public Meeting and Extend Public Period The West Virginia Department of Environmental Protection's Division of Air Quality (DAQ) will hold a virtual
Identifier									
DEP to Hold Public Meeting and Extend Public Period The West Virginia Department of Environmental Protection's Division of Air Quality (DAQ) will hold a virtual									
*=Extend Expiration Date									

The Parkersburg News and Sentinel

Legal Affidavit

(304) 485-1891 Ext. 301

RHONDA E HENDERSHOT
Douglas T Williams

Being first duly sworn, says that the:

WV DEPT OF ENVIRONMENTAL PROTECTION
LEGAL NOTICE
DEP - PUBLIC MEETING

Hereto attached was printed in the Parkersburg News and Sentinel
A daily newspaper published in the City of Parkersburg, Wood
County, West Virginia for: 1
successive week(s).

The first publication and posting therein being on the:

30TH day of AUGUST 2023

and subsequent publication(s) on the

 day(s) of

Printer's Fee	\$	69.60
Notary Fee	\$	2.00
Total Due	\$	71.60

By: *Rhonda E Hendershot*

Subscribed and sworn to before me this

30th day of August 2023

Tayla Faye Miracle
Notary Public for Wood County, WV

DEP to Hold Public Meeting and Extend Public Period

The West Virginia Department of Environmental Protection's Division of Air Quality (DAQ) will hold a virtual public meeting on Tuesday, September 12, 2023, to provide information and receive comments regarding DuPont Specialty Products USA, LLC's air quality permit application R13-1849Q. DuPont Specialty Products USA, LLC has proposed to correct errors in the number of allowable capper maintenance jet events, add a backup control device (emergency flare), and specify monitoring periods for short-term limitations. The facility is located at 8480 DuPont Road, Bldg 24 Washington, Wood County, WV, latitude 39.268611 and longitude -81.671162 degrees.

The DAQ will hold the public meeting virtually at 6:00 p.m. on Tuesday, September 12, 2023. Instructions for asking questions and providing oral comments at the virtual public meeting are provided below. DAQ staff members will be available to provide a presentation and answer questions before taking comments from the public. The public comment period has been extended to 5:00 p.m., Tuesday, September 19, 2023.

To participate online or by telephone, registration is required by 5:00 p.m. on Tuesday, September 12, 2023. To register, please complete the registration form at: <https://forms.gle/Y9ubEdgRCs3qv8896>. To register to provide oral comments, please indicate "yes" you want to provide oral comments on the record when you register. A confirmation email will be sent with information on how to join the public meeting. If you do not have internet access and want to register to participate via telephone, please contact Nicole Ernest at (304) 926-0499 x41256. Oral comments are limited to five (5) minutes. Video demonstrations and screen sharing by commenters is not permitted.

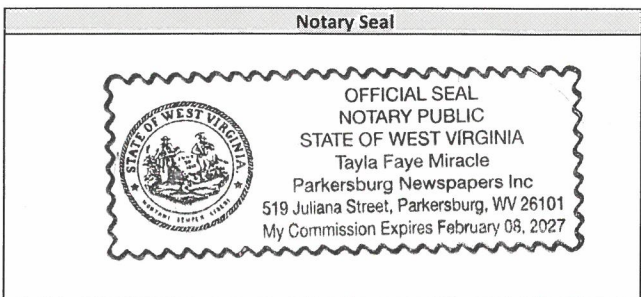
The purpose of the DAQ's permitting process is to make a preliminary determination of if the proposed permit will meet all state and federal requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at the public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Written comments must be received by 5:00 p.m. on Tuesday, September 19, 2023:

- Preferred Method: Email written comments to Jonathan.W.Carney@wv.gov with "DuPont Specialty Products USA, LLC, R13-1849Q Comments" in the subject line, or
- Mail hard copy comments to Jonathan Carney, WV Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304.

Instructions for downloading additional information, including copies of the draft permit, application, and all other supporting materials relevant to the permit decision is available at: <https://dep.wv.gov/daq/permitting/Pages/NSR-Permit-Applications.aspx>.

Aug 30





Carney, Jonathan W <jonathan.w.carney@wv.gov>

request a public hearing for permit application R13-1849P

1 message

Cindy Taylor <cwtaylor50@gmail.com>

Wed, Aug 23, 2023 at 2:02 PM

To: "jonathan.w.carney@wv.gov" <jonathan.w.carney@wv.gov>

Dear Mr. Carney,

As a cancer survivor and concerned citizen living in Parkersburg, Wood County, WV, I am asking for a public hearing for permit application R13-1849P to modify and

operate an acetal resin polymerization area located in Wood County, WV. Public health needs to be a top priority and any permit which would increase emissions is very concerning. You need to hear about our concerns.

Thank you for consideration,

Cindy Taylor

Parkersburg, WV

cwtaylor50@gmail.com



Carney, Jonathan W <jonathan.w.carney@wv.gov>

Chemours R13-1849P Permit

1 message

Randi Pokladnik <randi.pokladnik@gmail.com>

Wed, Aug 23, 2023 at 11:17 AM

To: Jonathan.W.Carney@wv.gov

Dear Mr. Carney, (Jonathan.W.Carney@wv.gov)

I am a concerned citizen from SE Ohio. I would like to request a public hearing for permit application R13-1849P to modify and operate an acetal resin polymerization area located in Wood County, WV. I am concerned about the increased emissions and impacts to the community.

The Mid-Ohio River Valley is already impacted by both air and water emissions generated from industrial facilities. It is imperative that residents in this area have the ability to voice their concerns in a public venue. [Based on studies](#), it has been shown that acetal plastics ([formaldehyde derivatives](#)) exhibit negative health effects from both short-term and long-term exposures. Short-term exposure to acetal resins can cause headache, dizziness and drowsiness and long-term exposures are linked to increased cancer, thyroid and general health issues.

Given these impacts to health, the local community deserves to be informed on how their health and environment will be affected from the expansion of the Chemours facility.

Thank you in advance for granting this request.

Randi Pokladnik
AAS Environmental Engineering, BA Chemistry, MA and PhD Environmental Studies
HAZ MAT Certified
ISO 14000 Certified Auditor

86200 Tappan Highland Road
Uhrichsville, Ohio 44683
740-922-5212

--

Dr. Randi Pokladnik
Tappan Lake
Uhrichsville, Ohio 44683

We forget that the water cycle and the life cycle are one.

- *Jacques Cousteau*

I understood when I was just a child that without water, everything dies.

I didn't understand until much later that no one "owns" water.

It might rise on your property, but it just passes through.

You can use it, and abuse it, but it is not yours to own.

It is part of the global commons, not "property" but part of our life support system.

- *Marq de Villiers, Water, 2000*



Carney, Jonathan W <jonathan.w.carney@wv.gov>

Pollution Nearby

1 message

madison brown <madisonbrown34@hotmail.com>

Tue, Aug 22, 2023 at 6:29 PM

To: "Jonathan.W.Carney@wv.gov" <Jonathan.W.Carney@wv.gov>

I am a concerned citizen from __Parkersburg__, WV. I would like to request a public hearing for permit application R13-1849P to modify and operate an acetal resin polymerization area located in Wood County, WV. I am concerned about the increased emissions and impacts to my community. Thank you in advance for granting this request."

Madison Brown
904 Julians St.
Parkersburg



Carney, Jonathan W <jonathan.w.carney@wv.gov>

Request for public hearing

1 message

J Adams <stonegarden@suddenlink.net>

Tue, Aug 22, 2023 at 7:52 PM

To: Jonathan.W.Carney@wv.gov

Dear Mr. Carney,

I am a native of the Mid Ohio Valley and concerned that Chemours is planning on dumping more toxic waste in our area. Enough is enough. I would like to request a public hearing for permit application R13-1849P to modify and operate an acetal resin polymerization area located in Wood County, WV. My concern is the increased emissions and impacts to the community.

Thank you in advance for granting this request.

Jann Adams
Marietta, OH



Carney, Jonathan W <jonathan.w.carney@wv.gov>

Public hearing request

1 message

Dawn Weidner <dawnweidner@gmail.com>

Tue, Aug 22, 2023 at 9:07 AM

To: Jonathan.W.Carney@wv.gov

Dear Mr. Carney,

I am a concerned citizen from Parkersburg, West Virginia. I am writing to request a public hearing for permit application R13-1849P to modify and operate an acetal resin polymerization area located in Wood County, WV. I have significant concerns about the increased emissions and impacts to my community.

I strongly feel that the Mid Ohio Valley has surpassed its threshold for pollution and other such contaminants.

Thank you in advance for granting this request.

Dawn Weidner

[20 Edgewood Park](#)

[Parkersburg WV 26104](#)



Carney, Jonathan W <jonathan.w.carney@wv.gov>

Public hearing request for permit application R13-1849P

1 message

Rebecca Phillips <bennphil@hotmail.com>

Mon, Aug 21, 2023 at 8:22 PM

To: "Jonathan.W.Carney@wv.gov" <Jonathan.W.Carney@wv.gov>

Dear Mr. Carney:

I am a concerned citizen from Marietta, Ohio, who taught for thirty years at West Virginia University Parkersburg, across the Little Kanawha from the facility now known as Chemours. I would like to request a public hearing for permit application R13-1849P to modify and operate an acetal resin polymerization area located in Wood County, WV.

Despite their unquestioned economic impact on the area, Dupont and Chemours have not always been good neighbors. As has been well-documented, many people have suffered major negative health effects from the facility's runoff and atmospheric emissions. I am concerned about the increased emissions and community impacts likely to result from the company's plans. The community deserves the opportunity to hear about Chemours' plans and to make itself heard. Thank you in advance for granting this request.

Rebecca Phillips
631 Second St.
Marietta, OH



Carney, Jonathan W <jonathan.w.carney@wv.gov>

Request for Public Hearing on R13-1849P

1 message

Eric Engle <ericengle85@yahoo.com>

Mon, Aug 21, 2023 at 7:14 PM

To: Jonathan.W.Carney@wv.gov

Dear Mr. Carney,

I am a concerned citizen from Parkersburg, WV. I would like to request a public hearing for permit application R13-1849P to modify and operate an acetal resin polymerization area located in Wood County, WV. I am concerned about the increased emissions and impacts to my community. Thank you in advance for granting this request.

Sincerely,

Eric Engle
Board President
Mid-Ohio Valley Climate Action
(304) 488-4384
ericengle85@yahoo.com
ericdengle85@gmail.com

“Not everything that is faced can be changed, but nothing can be changed unless it is faced.”
- James Baldwin



Carney, Jonathan W <jonathan.w.carney@wv.gov>

Chemours application R13-1849P

1 message

Carol Sedgwick <cibermage@gmail.com>

Mon, Aug 21, 2023 at 8:29 PM

To: Jonathan.W.Carney@wv.gov

Dear Mr. Carney,

I am a concerned citizen from Little Hocking, OH. I would like to request a public hearing for permit application R13-1849P to modify and operate an acetal resin polymerization area located in Wood County, WV. Having lived through the C8 pollution of our drinking water, I am concerned about the increased emissions and impacts to my community. I do not want my drinking water contaminated again (or more).

Thank you in advance for granting this request.

Sincerely,

Carol W. Sedgwick
Little Hocking, OH



Carney, Jonathan W <jonathan.w.carney@wv.gov>

DuPont Specialty affidavit

1 message

Mink, Stephanie R <stephanie.r.mink@wv.gov>
To: Jonathan W Carney <jonathan.w.carney@wv.gov>

Wed, Aug 2, 2023 at 10:01 AM

Please see attached.

--

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281



Parkersburg News - DuPont 13-1849P affidavit-Jonathan.pdf
984K



Carney, Jonathan W <jonathan.w.carney@wv.gov>

Re: FW: [EXTERNAL] CORRECTION: Re: WV Draft Permit R13-1849Q for DuPont Specialty Products USA, LLC; Washington Works

1 message

McKeone, Beverly D <beverly.d.mckeone@wv.gov>
To: "Carney, Jonathan W" <jonathan.w.carney@wv.gov>
Cc: Beverly D McKeone <beverly.d.mckeone@wv.gov>

Tue, Aug 1, 2023 at 2:12 PM

Do you mean the flare pilot lights? If so, I cannot approve the change. If the flare has a pilot light - it must be lit at all times - or else it is useless as a control - even for emergencies. You need to be able to call on the flare, ASAP - not send someone out to light the pilot light before you can use it in an emergency.

Bev

On Tue, Aug 1, 2023 at 2:07 PM Carney, Jonathan W <jonathan.w.carney@wv.gov> wrote:
Hello Bev,

Do any of the comments Larry Tock submitted rise to the level of needing to go back out to notice? I discussed them with him yesterday. I was not sure about the last one. The first two appear to be my errors. It does not appear that any of them result in increased emissions from normal operations.

Jonathan Carney

----- Forwarded message -----

From: **TOCK, LAWRENCE** <Lawrence.Tock@dupont.com>

Date: Mon, Jul 31, 2023 at 4:02 PM

Subject: FW: [EXTERNAL] CORRECTION: Re: WV Draft Permit R13-1849Q for DuPont Specialty Products USA, LLC; Washington Works

To: Jonathan W Carney <jonathan.w.carney@wv.gov>

Cc: Ankrom, Josh <josh.ankrom@dupont.com>, GILBERT, KEVIN L <Kevin.L.Gilbert-1@dupont.com>

Hello Mr. Carney,

In regard to the public notice of the proposed permit R13-1849Q, DuPont has the following comments.

If section 2.12 is being changed to "Reserved", then the draft permit still has two paragraphs 2.12.4 and 2.12.5 under what was section 2.12 that seem to have been inadvertently retained.

I also noted the change in THAP emissions for emission point DEME in the Engineering Evaluation/Fact Sheet listed increases of 2.07 lb/hr and 2.21 TPY. I believe this is incorrect. THAPs for DEME decrease by 1.69 lb/hr and 0.04 TPY per my calculations and as presented in the application on page 57 of 303 (shown below). The proposed limits in the permit are otherwise correct.

Attachment N

NET INCREASE / DECREASE IN PERMIT LIMITATIONS

Source	New	PPH	TPY
DMITFE	PM	0.01	0.01
	VOC	0.17	0.72
	NO _x	0.03	0.11
	SO ₂	0.01	0.01
	CO	0.08	0.34

	Increase/Decrease		
DEME	VOC	-4.00	-0.09
	HAPs	-1.69	-0.04
	CH ₂ O	0.03	0.00
	Hexane	-1.50	-0.02
	Toluene	-0.22	0.00

	Net Increase/Decrease		
	PM	0.01	0.01
	VOC	-3.83	0.63
	NO _x	0.03	0.11
	SO ₂	0.01	0.01
	CO	0.08	0.34
	HAPs	-1.69	-0.04
	CH ₂ O	0.03	0.00
	Hexane	-1.5	-0.02
	Toluene	-0.22	0.00

Page 57 of 303
05/08/23

Upon further internal review, DuPont believes section 4.1.8.2.2 should be revised to state that the flare, including its pilots, are only necessary to be operated for an emergency. The flare is being voluntarily installed and there are no specific regulations that specifically require this flare to be operated. That is to say, there is no air pollution control emission standard to be exceeded if the flare's pilots are not operating. DuPont would be willing to accept the following change we discussed, if acceptable to the DAQ after its further review:

4.1.8.2.2. The flare, DNTFF, ~~the permittee shall maintain at least one pilot light in operation while either emission unit DMH or DMI is in service, except for periods of maintenance to the flare and associated equipment. This flare~~ shall serve only to abate emissions from two tanks (sources DMH and DMI) during an emergency event, when one or both tanks vent through their emergency relief vents.

Thank you for taking the time to discuss the items listed above. We look forward to starting the installation of this flare as soon as possible after final issuance of the permit R13-1849Q.

Sincerely,

Lawrence Tock

Delrin® Environmental Coordinator

DuPont Washington Works

(681) 484-2980



From: Mink, Stephanie R <stephanie.r.mink@wv.gov>

Sent: Friday, July 21, 2023 2:53 PM

To: Supplee, Gwendolyn <supplee.gwendolyn@epa.gov>; Weinelt.Eva@epa.gov; leary.justin@epa.gov; Westbrook, Gregory A <Greg.A.Westbrook@dupont.com>; TOCK, LAWRENCE <Lawrence.Tock@dupont.com>

Cc: Crowder, Laura M <Laura.M.Crowder@wv.gov>; McKeone, Beverly D <Beverly.D.Mckeone@wv.gov>; McCumbers, Carrie <Carrie.McCumbers@wv.gov>; Nicole D Ernest <nicole.d.ernest@wv.gov>; Jonathan W Carney <jonathan.w.carney@wv.gov>; Johnson, Rebecca H <Rebecca.H.Johnson@wv.gov>; Angela K Chestnut <angela.k.chestnut@wv.gov>

Subject: [EXTERNAL] CORRECTION: Re: WV Draft Permit R13-1849Q for DuPont Specialty Products USA, LLC; Washington Works

Everyone: I have just been informed by the newspaper that, due to an extended power outage in the Parkersburg area, only a limited number of newspapers containing the legal notice we published today were distributed. The legal notice appeared

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Everyone:

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Should you have any questions or comments, please contact the permit writer, Jonathan Carney, at 304-926-0499, x 41247 or Jonathan.W.Carney@wv.gov. I apologize for the delay.

Thank you

Stephanie

On Wed, Jul 19, 2023 at 10:23 AM Mink, Stephanie R <stephanie.r.mink@wv.gov> wrote:

Please find attached the Draft Permit R13-1849Q, Engineering Evaluation and Public Notice for DuPont Specialty Products USA, LLC's Washington Works facility located in Wood County.

The public notice will be published in the *Parkersburg News and Sentinel* on Friday, July 21, 2023 and the thirty day comment period will end on Monday, August 21, 2023.

Should you have any questions or comments, please contact the permit writer, Jonathan Carney, at 304-926-0499, x 41247 or Jonathan.W.Carney@wv.gov.

--

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

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<https://www.dupont.com/email-disclaimer.html>

--

Jonathan Carney, P.E.
WV Department of Environmental Protection
Division of Air Quality
NSR/Title V Air Permitting
[601 57th St SE](#)
[Charleston, WV 25304](#)
(304) 926-0499 ext. 41247
Jonathan.W.Carney@wv.gov



Carney, Jonathan W <jonathan.w.carney@wv.gov>

FW: [EXTERNAL] CORRECTION: Re: WV Draft Permit R13-1849Q for DuPont Specialty Products USA, LLC; Washington Works

1 message

TOCK, LAWRENCE <Lawrence.Tock@dupont.com>

Mon, Jul 31, 2023 at 4:01 PM

To: Jonathan W Carney <jonathan.w.carney@wv.gov>

Cc: "Ankrom, Josh" <josh.ankrom@dupont.com>, "GILBERT, KEVIN L" <Kevin.L.Gilbert-1@dupont.com>

Hello Mr. Carney,

In regard to the public notice of the proposed permit R13-1849Q, DuPont has the following comments.

If section 2.12 is being changed to "Reserved", then the draft permit still has two paragraphs 2.12.4 and 2.12.5 under what was section 2.12 that seem to have been inadvertently retained.

I also noted the change in THAP emissions for emission point DEME in the Engineering Evaluation/Fact Sheet listed increases of 2.07 lb/hr and 2.21 TPY. I believe this is incorrect. THAPs for DEME decrease by 1.69 lb/hr and 0.04 TPY per my calculations and as presented in the application on page 57 of 303 (shown below). The proposed limits in the permit are otherwise correct.

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Source	New	PPH	TPY
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	VOC	0.17	0.72
	NOx	0.03	0.11
	SO2	0.01	0.01
	CO	0.08	0.34
DENE	Increase/Decrease		
	VOC	-4.00	-0.09
	HAPs	-1.69	-0.04
	CH2O	0.03	0.00
	Hexane	-1.50	-0.02
Toluene	-0.22	0.00	
	Net Increase/Decrease		
	PM	0.01	0.01
	VOC	-3.83	0.63
	NOx	0.03	0.11
	SO2	0.01	0.01
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Upon further internal review, DuPont believes section 4.1.8.2.2 should be revised to state that the flare, including its pilots, are only necessary to be operated for an emergency. The flare is being voluntarily installed and there are no specific regulations that specifically require this flare to be operated. That is to say, there is no air pollution control emission standard to be exceeded if the flare’s pilots are not operating. DuPont would be willing to accept the following change we discussed, if acceptable to the DAQ after its further review:

4.1.8.2.2. The flare, DNTFF, ~~the permittee shall maintain at least one pilot light in operation while either emission unit DMH or DMI is in service, except for periods of maintenance to the flare and associated equipment. This flare~~ shall serve only to abate emissions from two tanks (sources DMH and DMI) during an emergency event, when one or both tanks vent through their emergency relief vents.

Thank you for taking the time to discuss the items listed above. We look forward to starting the installation of this flare as soon as possible after final issuance of the permit R13-1849Q.

Sincerely,

Lawrence Tock

Delrin® Environmental Coordinator

DuPont Washington Works

(681) 484-2980



From: Mink, Stephanie R <stephanie.r.mink@wv.gov>

Sent: Friday, July 21, 2023 2:53 PM

To: Supplee, Gwendolyn <supplee.gwendolyn@epa.gov>; Weinelt.Eva@epa.gov;
leary.justin@epa.gov; Westbrook, Gregory A <Greg.A.Westbrook@dupont.com>; TOCK,
LAWRENCE <Lawrence.Tock@dupont.com>

Cc: Crowder, Laura M <Laura.M.Crowder@wv.gov>; McKeone, Beverly D
<Beverly.D.Mckeone@wv.gov>; McCumbers, Carrie <Carrie.McCumbers@wv.gov>; Nicole D
Ernest <nicole.d.ernest@wv.gov>; Jonathan W Carney <jonathan.w.carney@wv.gov>; Johnson,
Rebecca H <Rebecca.H.Johnson@wv.gov>; Angela K Chestnut <angela.k.chestnut@wv.gov>

Subject: [EXTERNAL] CORRECTION: Re: WV Draft Permit R13-1849Q for DuPont Specialty
Products USA, LLC; Washington Works

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Should you have any questions or comments, please contact the permit writer, Jonathan Carney, at 304-926-0499, x 41247 or Jonathan.W.Carney@wv.gov. I apologize for the delay.

Thank you

Stephanie

On Wed, Jul 19, 2023 at 10:23 AM Mink, Stephanie R <stephanie.r.mink@wv.gov> wrote:

Please find attached the Draft Permit R13-1849Q, Engineering Evaluation and Public Notice for DuPont Specialty Products USA, LLC's Washington Works facility located in Wood County.

The public notice will be published in the *Parkersburg News and Sentinel* on Friday, July 21, 2023 and the thirty day comment period will end on Monday, August 21, 2023.

Should you have any questions or comments, please contact the permit writer, Jonathan Carney, at 304-926-0499, x 41247 or Jonathan.W.Carney@wv.gov.

--

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

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<https://www.dupont.com/email-disclaimer.html>

3 attachments



107-00001_Draft PERM_13-1849Q.pdf

1287K



107-00001_PubNotice_13-1849Q revised.pdf

13K



107-00001_EVAL_13-1849Q.pdf

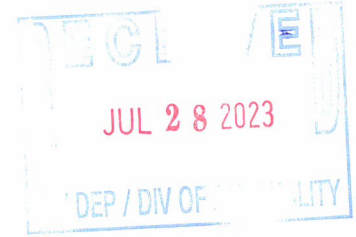
2313K

Classified/Legal Advertising Invoice

Parkersburg News and Sentinel

519 Juliana St Parkersburg WV 26101
 PO Box 1787 Parkersburg WV 26102

(304) 485-1891



**WV DEPT OF ENVIRONMENTAL PROTECTION
 DIVISION OF AIR QUALITY
 601 57TH STREET SE
 CHARLESTON, WV**

07/21/2023 3:11:34PM

25304

No: 147797

Phone: 304 926-3727

Ad No 147797	Customer No: L00050	Start Date 07-25-2023	Stop Date 07-25-2023	Category: Legals		Classification: Legals				
Order No	Rate: LE	Lines: 57	Words: 350	Inches: 5.58	Cost 69.20	Payments .00	Balance 69.20			
Publications ... Runs News Legals ... 1 WV Online Legals PKB ... 1		Solicitor: RH	Origin: 10	Sales Rep: 120	Credit Card	Credit Card Number	Card Expire			
		<table border="1" style="width: 100%;"> <tr> <td style="text-align: center;">Identifier</td> </tr> <tr> <td>AIR QUALITY PERMIT NOTICE Notice of Open Comment Period</td> </tr> <tr> <td>On May 5, 2023, DuPont Specialty Products USA, LLC</td> </tr> </table>						Identifier	AIR QUALITY PERMIT NOTICE Notice of Open Comment Period	On May 5, 2023, DuPont Specialty Products USA, LLC
Identifier										
AIR QUALITY PERMIT NOTICE Notice of Open Comment Period										
On May 5, 2023, DuPont Specialty Products USA, LLC										
		<p><i>7-25</i></p>								
		<p>*=Extend Expiration Date</p>								

AIR QUALITY PERMIT NOTICE
Notice of Open Comment Period

On May 5, 2023, DuPont Specialty Products USA, LLC applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to modify and operate a acetal resin polymerization area located in Wood County, WV at latitude 39.268611 degrees and longitude -81.671162 degrees. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed facility. The DAQ is providing notice to the public of an open comment period for permit application R13-1849P.

The following changes in potential emissions will be authorized by this permit action: Increase Carbon Monoxide, 0.34 TPY; Increase Nitrogen Oxides, 0.11 TPY; Increase Particulate Matter 0.01 TPY; Increase Sulfur Dioxide, 0.01 TPY; Increase Volatile Organic Compounds, 0.63 TPY; Decrease Hexane, 0.02 TPY; Decrease Total Hazardous Air Pollutants, 0.04 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on Thursday, August 24, 2023. A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed modification will meet all state and federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Jonathan Carney
 WV Department of Environmental Protection
 Division of Air Quality
 601 57th Street, SE
 Charleston, WV 25304
 Telephone: 304/926-0499, ext. 41247
 Email: Jonathan.W.Carney@wv.gov

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:
<https://dep.wv.gov/daq/permitting/Pages/NSR-Permit-Applications.aspx>

July 25

The Parkersburg News and Sentinel
 Affidavit
 (304) 485-1891 Ext. 267

Douglas T Williams

Being first duly sworn, says that the:

WV DEP DIV OF AIR DIV OF AIR QUALITY
LEGAL NOTICE
OPEN COMMENT PERIOD

Hereto attached was printed in the Parkersburg News and Sentinel A daily newspaper published in the City of Parkersburg, Wood County, West Virginia for: 1 dates(s).

The first publication and posting therein being on the:

25TH day of July 2023

and subsequent publication(s) on the

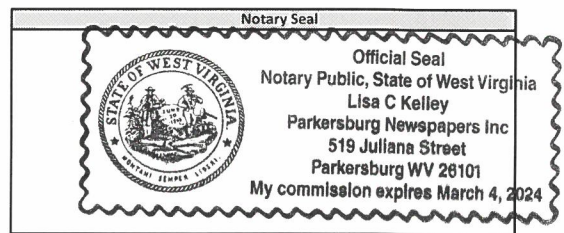
 day(s) of

Printer's Fee	<u>\$67.20</u>
Notary Fee	<u>\$2.00</u>
Total Due	<u>\$69.20</u>

By: *Douglas T. Williams*

Subscribed and sworn to before me this
25th day of July 2022

Lisa C. Kelley
 Notary Public for Wood County, WV





Carney, Jonathan W <jonathan.w.carney@wv.gov>

RE: [EXTERNAL] DuPont Specialty Draft Permit

1 message

TOCK, LAWRENCE <Lawrence.Tock@dupont.com>
To: "Carney, Jonathan W" <jonathan.w.carney@wv.gov>
Cc: "Ankrom, Josh" <josh.ankrom@dupont.com>

Fri, Jul 7, 2023 at 4:50 PM

Hi Jonathan:

The only difference between that which was requested and that of the draft is in Appendix A for (Equipment ID) DEM-OH. This was mentioned in Attachment D on page 21 of 303 of the application (copied below for your convenience) along with a copy of what was requested for Appendix A.

- 4) The CDS for DEM-OH listed an average of 35 gpm and a maximum of 50 gpm in the 2011 permit application. At the time of the previous permit application, monitoring of this flow rate was not available, but has since been added for compliance monitoring purposes. Furthermore, the pressure on the water header can be affected due to other uses within the plant that can affect this rate and which are beyond the control of DuPont. The maximum flow rate of the once through scrubbing liquor (water) is limited to 50 gpm in the current permit. A slight increase above this would only improve abatement of emissions. In our opinion, it is counterintuitive to set a maximum rate for the scrubber liquor so long as the scrubber does not become flooded due to too much water being used. DuPont does not believe this to be possible for the existing water supply line to the scrubber. Thus, DuPont requests that a minimum three-hour average flow rate of 35 gpm be included in the permit rather than a maximum value when abating emissions from CMJEs.

DEM-OH	DEME	Emergency Wet Scrubber	Scrubber Liquid Flow	50 -> 35 gpm	Continuous record when GZZ1 or GZZ2 emission unit is in operation	3-hour
--------	------	------------------------	----------------------	--------------	---	--------

Otherwise, I think we are in agreement on the revisions for the permit modification.

Thanks for the effort and I hope you can enjoy your time out of the office,

Lawrence Tock
Delrin@ Environmental Coordinator
DuPont Washington Works
(681) 484-2980



From: Carney, Jonathan W <jonathan.w.carney@wv.gov>
Sent: Friday, July 7, 2023 3:43 PM
To: TOCK, LAWRENCE <Lawrence.Tock@dupont.com>
Subject: [EXTERNAL] DuPont Specialty Draft Permit

Company: DuPont Specialty Products Facility Name: Washington Works Facility ID: 107-00001 Application Number: R13-1849Q Hello Larry, Attached is the draft permit. Please, review this and let me know if you have any questions or concerns by July

ZjQcmQRYFpfpIBannerStart

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ZjQcmQRYFpfpIBannerEnd

Company: DuPont Specialty Products
Facility Name: Washington Works
Facility ID: 107-00001
Application Number: R13-1849Q

Hello Larry,

Attached is the draft permit. Please, review this and let me know if you have any questions or concerns by July 17, 2023. I will be out of the office all next week. I believe I incorporated all of the changes that you requested. I elaborated somewhat on the flare requirement limiting its use to emergency venting in 4.1.8.2.2. I will send the draft to my manager for review as well. She may request changes. You will have the opportunity to make comments during the public comment period also.

--

Jonathan Carney, P.E.

WV Department of Environmental Protection

Division of Air Quality

NSR/Title V Air Permitting

[601 57th St SE](#)

[Charleston, WV 25304](#)

(304) 926-0499 ext. 41247

Jonathan.W.Carney@wv.gov

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7/17/23, 2:09 PM

State of West Virginia Mail - RE: [EXTERNAL] DuPont Specialty Draft Permit

Unless explicitly and conspicuously designated as "E-Contract Intended", this e-mail does not constitute a contract offer, a contract amendment, or an acceptance of a contract offer. This e-mail does not constitute a consent to the use of sender's contact information for direct marketing purposes or for transfers of data to third parties.

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<https://www.dupont.com/email-disclaimer.html>



Carney, Jonathan W <jonathan.w.carney@wv.gov>

WV DAQ NSR Permit Application Complete for DuPont Specialty Products - Washington Works

1 message

Carney, Jonathan W <jonathan.w.carney@wv.gov>

Fri, Jun 2, 2023 at 1:00 PM

To: greg.westbrook@dupont.com, "TOCK, LAWRENCE" <Lawrence.Tock@dupont.com>

**RE: Application Status: Complete
DuPont Specialty Products - Washington Works
Permit Application R13-1849Q
Plant ID No. 107-00001**

Mr. Westbrook,

Your application for a modification permit for a plastics material and resin manufacturing facility was received by this Division on May 5, 2023 and assigned to the writer for review. Upon review of said application, it has been determined that the application is complete and, therefore, the statutory review period commenced on June 2, 2023.

In the case of this application, the agency believes it will take approximately 90 days to make a final permit determination.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact Jonathan Carney at (304) 926-0499 ext. 41247 or reply to this email.

--

Jonathan Carney, P.E.
WV Department of Environmental Protection
Division of Air Quality
NSR/Title V Air Permitting
601 57th St SE
Charleston, WV 25304
(304) 926-0499 ext. 41247
Jonathan.W.Carney@wv.gov



Carney, Jonathan W <jonathan.w.carney@wv.gov>

36 hours for Cappers

1 message

TOCK, LAWRENCE <Lawrence.Tock@dupont.com>

Fri, Sep 1, 2023 at 2:26 PM

To: Jonathan W Carney <jonathan.w.carney@wv.gov>, "Ankrom, Josh" <josh.ankrom@dupont.com>

Josh and Jonathan,

I found the other potential source of the reference to 36 hours, it was in Emission Unit Description Sheet (EUDS) for both GZZ1 and GZZ2, I was searching for the wrong ID earlier today.

The potential source was the operating schedule information in the EUDS, as follows:

input:			N/A			x 106 BTU/hr.
7. Projected operating schedule:						
Hours/Day	9	Days/Week	1	Weeks/Year	4	

As I mentioned, the steam jets evacuate all but a small residual from the cappers in the first few minutes and any continued emissions beyond that, for as many hours the steam jet is left running, are just a residue with traces of the contents of the capper after its feeds have been shut down, (feed shutdowns occurring when or before the steam jet was started). The total emissions over any length of time for a capper maintenance jet event don't exceed the amount of vapor from one capper's volume. Thus, we simply attribute all the emissions to the first hour. There is only one emission point for both GZZ1 and GZZ2, so the earlier application should have listed at least 72 hours (2 cappers x 36 hr/capper) for each capper at emission point DEME. That, otherwise, should have been 2 x 45 as we discussed or 90 hours or events per year based upon the calculated emission estimate of Attachment N from the application submitted in 2011 or earlier. Item 7 just did not match the Attachment J hours of that earlier application.

If you have questions, let me know.

Thanks,

Lawrence Tock

Delrin@ Environmental Coordinator

DuPont Washington Works

(681) 484-2980



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Carney, Jonathan W <jonathan.w.carney@wv.gov>

Public Notice Affidavit - R13-1849Q

1 message

TOCK, LAWRENCE <Lawrence.Tock@dupont.com>

Thu, May 11, 2023 at 1:43 PM

To: Jonathan W Carney <jonathan.w.carney@wv.gov>

Cc: "Mink, Stephanie R" <stephanie.r.mink@wv.gov>, "Scott, Kimberly A" <Kimberly.A.Scott@wv.gov>

Hi Jonathan:

Attached is a file with a copy of the affidavit that the legal notice was published in the local newspaper for permit Application R13-1849Q.

That leaves fee payments to be finalized for your completeness review, if I am not mistaken. I will try to call you later this afternoon to discuss.

Thanks,

Lawrence Tock

Delrin® Environmental Coordinator

DuPont Washington Works

(681) 484-2980



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Public Notice Affidavit for Publication - R13-1849Q.pdf
43K

The Parkersburg News and Sentinel
Legal Affidavit
(304) 485-1891 Ext. 301

Rhonda E Hendershot

Being first duly sworn, says that the:

DUPONT SPECIALTY PRODUCTS
LEGAL NOTICE
AIR QUALITY PERMIT NOTICE OF APPLICATION

Hereto attached was printed in the Parkersburg News and Sentinel
A daily newspaper published in the City of Parkersburg, Wood
County, West Virginia for: 1
successive week(s).

The first publication and posting therein being on the:

10TH day of MAY 2023

and subsequent publication(s) on the

 day(s) of 2022

Printer's Fee	\$	43.80
Notary Fee	\$	2.00
Total Due	\$	45.80

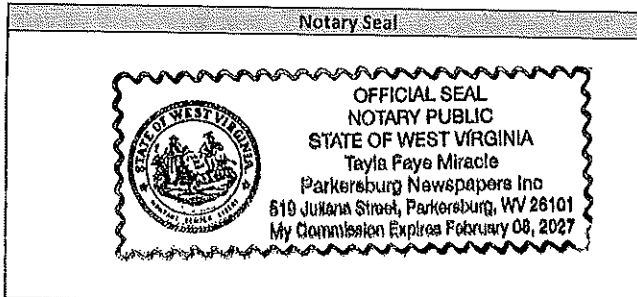
Paid

By: Rhonda E Hendershot

Subscribed and sworn to before me this

10th day of May 2023

Tayla Miracle
Notary Public for Wood County, WV



AIR QUALITY
PERMIT NOTICE
Notice of Application

Notice is given, in accordance with West Virginia State regulations 45 CSR13.8 that DuPont Specialty Products USA, LLC, has applied to the West Virginia Department of Environmental Protection, Division of Air Quality for a Modification Permit to correct operating parameter restrictions in the permit for copper maintenance jet events, to specify monitoring periods for short term permit limit determinations not currently specified in the permit, and to install an emergency flare in the Acetal Resin Chemical Area located at 8480 DuPont Road, Washington, WV 26181, in Wood County, West Virginia. The latitude and longitude coordinates are: 39.268257, -81.668679.

The applicant estimates the increased potential to discharge the following Regulated Air Pollutants will be: 0.34 TPY of CO, 0.11 TPY NOx, 0.63 TPY of VOC, and 0.01 TPY of SO2; 0.01 TPY particulate matter.

Startup of operation is planned to begin on or about the 3rd day of October, 2023. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, West Virginia 25304, for at least 30 calendar days from the date of publication of this notice. Written comments will also be received via email at DEP.AirQualityPermitting@WV.gov.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 41281, during normal business hours.

Dated this the 10th day of May 2023.

DuPont Specialty Products
USA, LLC
Greg A. Westbrook
Plant Manager
P.O. Box 2600
Washington, West Virginia
26181-2600

May 10