

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 September 10, 2020.

Permit Number: **R30-10700208-2020 (6 of 14)**
Application Received for MM01: **August 03, 2022**
Application Received for MM02: **December 14, 2022**
Plant Identification Number: **03-54-107-00208**
Permittee: **DuPont Polymer Products, LLC**
Facility Name: **Washington Works**
Business Unit: **Engineering Polymers (EPC) - East**
Mailing Address: **P.O. Box 2600 Washington, WV 26181-2600**

Permit Action Number: *MM01 and MM02* Revised: *April 11, 2023*

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 442.368 km Easting • 4,346.679 km Northing • Zone 17
Directions: From I-77, take Exit 176 to U.S. Route 50W towards Athens, Ohio. At the last exit prior to the bridge, exit from Route 50 Bypass onto DuPont Road (Route 892). At the light, turn left onto DuPont Road. Approximately one mile from the turn, the facility is on the right.

Facility Description

This permit revision includes the changes made with minor modifications MM01 and MM02 for R30-10700208-2020 (6 of 14).

MM01 is associated with the Class I Administrative Updates R13-26170 and R13-3574. DuPont Specialty Products USA, LLC was preparing for a change in ownership of some of the process equipment located at the Washington Works facility. For this reason, applications were submitted for the Class I Administrative Update permits in order to separate the permit requirements and certain emission units which would remain with DuPont Specialty Products USA, LLC (107-00001) from the ones which would be transferred to

DuPont Polymer Products, LLC (107-00208). MM01 incorporates the changes made under permit R13-3574.

MM02 incorporates the changes made with the Class I Administrative Update R13-2244J. This permit revision was requested to relocate dry additive feeder equipment (including a bag unloading, receiver hopper, feeder, and filters) for the CP6 Extruder Line.

Emissions Summary

No changes in net potential emissions are expected to occur due to this revision.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAP. Therefore, DuPont Polymer Products, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

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

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

Federal and State:	45CSR7	To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations.
	45CSR13	NSR Permit Requirements.
	45CSR30	Operating Permit Requirements.

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

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

Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance
R13-2244J	January 25, 2023
R13-3574	September 26, 2022

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

MM01 incorporates the NSR permit R13-3574 into the existing Title V operating permit and removes references to R13-2617 from the operating permit. R13-3574 was issued in response to the applications for the Class I Administrative Update permits in which certain emission units previously permitted under R13-2617N were moved to the new permit R13-3574 in preparation of the transfer of emission units from DuPont Specialty Products USA, LLC (107-00001) to DuPont Polymer Products, LLC (107-00208). No changes were made to the requirements which were transferred from R13-2617N to R13-3574.

MM02 incorporates the revisions made with the Class I Administrative Update R13-2244J into the operating permit. This revision includes the relocation of dry additive feeder equipment 280-208S and 280-209S of the CP6 Extruder Line to new emission points 280-208E and 280-209E.

The following changes have been made to the Title V operating permit in accordance with R13-3574:

1. Throughout the permit
 - a. The permittee's name has been changed to DuPont Polymer Products, LLC, and the facility ID has been updated to 107-00208.
 - b. The permittee's mailing address has been updated to P.O. Box 2600, Washington, WV 26181-2600.
 - c. The Title V permit number has been changed from R30-10700001-2020 to R30-10700208-2020 to reflect the new facility's ID.
2. Section 1.0. – Emission Units and Active R13, R14, and R19 Permits
 - a. The table of active permits was updated to replace R13-2617L with R13-3574. R13-3574 was issued on September 26, 2022.
3. Section 2.0. – General Conditions
 - a. The authority of Condition 2.11.4. has been updated to 45CSR§30-2.40. due to a change in 45CSR30.
 - b. The authority of Condition 2.22.1. has been updated to 45CSR§30-5.3.e.3.B. due to the repeal of Rule 45CSR38 by Senate Bill No. 163.
4. Section 3.0. – Facility-Wide Requirements
 - a. Several facility-wide conditions have been updated to replace the references to the requirements of R13-2617 with those of R13-3574.
 - b. The U.S. EPA address has been updated in Condition 3.5.3.

The following changes have been made to the Title V operating permit in accordance with R13-2244J:

1. Section 1.0. – Emission Units and Active R13, R14, and R19 Permits
 - a. The Emission Units Table has been updated as follows:
 - i. The CP6 Additive Feeder (Emission Unit ID: 280-208S, Emission Point: 280-208E) and the CP6 Additive Station (Emission Unit ID: 280-209S, Emission Point: 280-209E) have been added to the table. Emissions from the CP6 Additive Feeder are controlled by the baghouse 280-208C, and emissions from the CP6 Additive Station are controlled by the baghouse 280-209C.
 - ii. The CP6 additive feeder equipment was relocated from emission points 280-186E and 280-201E. Thus, the throughputs of 280-186S and 280-201S have each been decreased from 10,500 pph to 10,000 pph.

- b. The table of active permits was updated to replace R13-2244I with R13-2244J. R13-2244J was issued January 25, 2023.

2. Section 4.0. – Source-Specific Requirements

- a. The Particulate Matter – 10 (PM₁₀) and Total Particulate Matter (TSP) limits for emission points 280-208E and 280-209E have been added to Table 4.1.1.
- b. Emission Points 280-208E and 280-209E are subject to the requirements of 45CSR7 to control particulate matter air pollution from manufacturing processes. The emission points of these units have been added to the citations of Conditions 4.1.4. and 4.1.5. which contain the visible emission requirements from 45CSR§§7-3.1. and -3.2.

280-208E and 280-209E are also subject to the particulate matter emission limits established through 45CSR§7-4.1. The operations are a Type ‘a’ source operation as defined in 45CSR§7-2.39.a. Based on Table 45-7A and the process weight rate of 500 pph for each source, the particulate matter emission limits of each source is 0.6 pph. Compliance with these emission limits is demonstrated through compliance with the more stringent emission limits established through Condition 4.1.1. of this operating permit.

- c. The authority of Condition 4.1.9. has been updated to replace 45CSR§13-5.11. with 45CSR§13-5.10. per 4.1.11. of R13-2244J.
- d. In accordance with 4.2.1. of R13-2244J, Condition 4.2.1. was amended to remove the maximum of forty-five days between consecutive readings from the opacity monitoring requirement.

Non-Applicability Determinations

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

Not applicable.

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: Not Applicable.
Ending Date: Not Applicable.

Point of Contact

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

Sarah Barron
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41915
sarah.k.barron@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)

On March 31, 2023, revisions to 45CSR30 were finalized. Accordingly, certain boilerplate conditions of the Title V operating permit have been updated as follows:

1. In 45CSR30, the definition of “Secretary” was relocated to 45CSR§30-2.39. Therefore, in Condition 2.1.3., the reference to 45CSR§30-2.12. has been replaced with 45CSR§30-2.39.
2. The emergency and affirmative defense requirements of Section 2.17. have been removed from the operating permit, and Section 2.17. has been marked as “Reserved.” The authority for these conditions, 45CSR§30-5.7., has been removed from 45CSR30.
3. 45CSR§30-8 has been revised and no longer requires the submission of certified emissions statements. Condition 3.5.4. has been updated accordingly.
4. The requirements of Conditions 3.5.7. and 3.5.8.a.1. have been removed from the operating permit and replaced with “Reserved.” due to the removal of 45CSR§30-5.7. from the rule.
5. Due to revisions in 45CSR§30-5.1.c.3.C.2., “telefax” has been updated to “email” in Condition 3.5.8.a.2.