

# Fact Sheet



## *For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act*

Permit Number: **R30-10700182-2022**  
Application Received: **April 7, 2021**  
Plant Identification Number: **10700182**  
Permittee: **The Chemours Company FC, LLC**  
Facility Name: **Washington Works**  
Business Unit: **Research and Development (Part 11 of 14)**  
Mailing Address: **8480 DuPont Road – Building 1, Washington, WV 26181-1217**

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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 the Route 50 Bypass around Parkersburg toward Ohio. Take the last exit prior to the bridge exit from the Route 50 Bypass onto DuPont Road. At the light turn left onto DuPont road. The facility is on the right approximately ½ miles from the turn.

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### **Facility Description**

In the Research and Development (R&D) area, there are various pieces of small-scale process equipment, laboratories, and maintenance facilities. The majority of the laboratories conduct research or development work. However, the semi-works & PPL areas manufacture commercial product on a small scale. This permit only covers the portions of the Research and Development (R&D) Area which manufacture commercial product and does not include activities that are defined as research and development and are exempt from permitting under 45CSR30.

In the commercial production area, polymer resins and ingredients are melt compounded into a final pelletized product through an extrusion/cutting operation. The raw materials are received in individual packaging or in bulk, and the final product is shipped in bags, boxes, drums or bulk containers.

SIC Code: 2821

## Emissions Summary

<b>Research and Development Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions Part 11 of 14</b>	<b>2020 Facility-wide Actual Emissions</b>
Carbon Monoxide (CO)	0.01	90.92
Nitrogen Oxides (NO <sub>x</sub> )	0	733.28
Particulate Matter (PM <sub>2.5</sub> )	0.63	3.50
Particulate Matter (PM <sub>10</sub> )	3.73	26.16
Total Particulate Matter (TSP)	3.73	140.45
Sulfur Dioxide (SO <sub>2</sub> )	0	1347.61
Volatile Organic Compounds (VOC)	26.30	140.36

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions Part 11 of 14</b>	<b>2020 Facility-wide Actual Emissions</b>
Total HAP's (no individual HAP ≥ 10 TPY)	11.00	30.02

*Some of the above HAPs may be counted as PM or VOCs.*

### Title V Program Applicability Basis

This facility has the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year aggregate HAPs. Chemours Washington Works is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

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

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

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor sources.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances

State Only:	45CSR4	No objectionable odors.
	45CSR§21-40	Control of VOC emissions
	45CSR§21-30	Control of VOC emissions from cold and solvent metal cleaning.
	45CSR27	Best Available Technology (BAT) for HAPs

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

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

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2654E	October 15, 2021	NA
R13-3223	December 8, 2014	NA

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

### Determinations and Justifications

This Title V renewal includes changes submitted as Title V minor modification R30-10700182-2016 (11 of 14) (MM01) and approved under R13-2654E. The following changes have been made since the most recent version of this permit:

- Emission Points EF-55, EF-56, EF-65, and EF-66 have been added to the Emission Units table.
- From section 4.4.4., removed 'These records shall be maintained according to the conditions specified in 40 C.F.R. §63.10(b)(1)'.
- Changed section 4.4.5. to reserved.
- Section 9 - Small-Scale Production Operation in a Laboratory Setting (Emission Points: EF-55, EF-56, EF-65, EF-66 - Teflon AF/FC Blending) was added.

### **40 C.F.R. 64 - Compliance Assurance Monitoring (CAM)**

There have been no modifications to this permit that would require Compliance Assurance Monitoring (CAM).

## Non-Applicability Determinations

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

- a. 40 C.F.R. 60, Subpart K - “Standards of Performance For Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.” There are no storage tanks in Research and Development.
- b. 40 C.F.R. 60, Subpart Ka - “Standards of Performance for Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984.” There are no storage tanks in Research and Development.
- c. 40 C.F.R. 60, Subpart Kb - “Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.” There are no storage tanks in Research and Development.
- d. 40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.” Research and Development does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.
- e. 40 C.F.R. 60, Subpart DDD - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.” Research and Development does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
- f. 40 C.F.R. 60, Subpart RRR - “Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.” Research and Development does not produce any of the chemicals listed in 40 C.F.R. §60.707 as a product, co-product, by-product, or intermediate.
- g. 40 C.F.R. 61, Subpart V - “National Emission Standards for Equipment Leaks (Fugitive Emissions Sources).” Applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in Research and Development.
- h. 40 C.F.R. 63, Subpart H - “National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.” 40 C.F.R. 63 Subparts F, G, and H do not apply to Research and Development, as it does not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- i. 40 C.F.R. 63, Subpart T - “National Emission Standards for Halogenated Solvent Cleaning.” There are no solvent cleaning units in Research and Development using halogenated solvents as listed in §63.460(a).
- j. 40 C.F.R. 63, Subpart DD – “National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations.” The Research and Development Area does not receive off-site materials as specified in paragraph 40 C.F.R. §63.680(b) and the operations are not one of the waste management operations or recovery operations as specified in 40 C.F.R. §§63.680(a)(2)(i) through (a)(2)(vi).

- k. 40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins. Research and Development does not produce the materials listed in 40 C.F.R. §63.1310.
- l. 40 C.F.R. 63, Subpart EEEE – “National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline).” The Research and Development Area does not operate an organic liquids distribution (OLD) operation and does not handle material organic liquids as defined in §63.2406.
- m. 40 C.F.R. 63, Subpart MMMM - “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.” There are no surface coating activities conducted in Research and Development subject to the requirements of this rule.
- n. 40 C.F.R. 63, Subpart PPPP – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.” The Research and Development Area does not produce an intermediate or final product that meets the definition of “surface coated” plastic part.
- o. 40 C.F.R. 63, Subpart QQQQ - “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products.” The surface coating activities of Research and Development are excluded from the requirements of the rule because they are non-commercial operations using coatings supplied by non-refillable aerosol containers.
- p. 40 C.F.R. 63, Subpart RRRR - “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.” The surface coating activities of Research and Development use non-refillable aerosol containers for the purpose of repairing furniture for on-site use and are excluded from the requirements of the rule.
- q. 40 C.F.R. 63, Subpart WWWW - “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” The Research and Development Area does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.
- r. 40 C.F.R. 63, Subpart DDDDD – “National Emission Standards for Hazardous Air Pollutants: Industrial/Commercial/Institutional Boilers and Process Heaters.” The Research and Development Area does not own or operate an industrial, commercial, or institutional boiler or process heater as defined in 40 C.F.R. §63.7575.
- s. 40 C.F.R. 63, Subpart GGGGG – “National Emission Standards for Hazardous Air Pollutants: Site Remediation.” Research and Development does not conduct site remediation as defined in §63.7957.
- t. 40 C.F.R. 63, Subpart HHHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” Research and Development does not manufacture coatings as defined in 40 C.F.R. §63.8105.
- u. 40 C.F.R. 63, Subpart NNNNN – “National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production.” Research and Development does not produce a liquid HCl product.

- v. 40 C.F.R. 82, Subpart B - “Protection of Stratospheric Ozone.” Requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing equipment need to be licensed. Research and Development does not conduct motor vehicle maintenance involving CFCs on site.
- w. 40 C.F.R. 82, Subpart C – “Protection of Stratospheric Ozone.” Bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. The Research and Development Area does not use, manufacture, nor distribute these materials.
- x. 45CSR2 – “To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.” The Research and Development Area does not contain any fuel burning units.
- y. 45CSR10 – “To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.” The Research and Development Area does not have any emission sources of sulfur oxides subject to this rule.
- z. 45CSR16 – “Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60.” The Research and Development Area is not subject to any requirements under 40 C.F.R. 60.
- aa. 45CSR17 – “To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.” Per 45CSR§17-6.1, the Research and Development Area is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.
- bb. 45CSR34 – “Emission Standards for Hazardous Air Pollutants.” The Research and Development Area is not subject to any requirements under 40 C.F.R. 61 or 40 C.F.R. 63.

**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: December 29, 2021  
Ending Date: January 28, 2022

**Point of Contact**

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

Jonathan Carney  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 41247 • Fax: 304/926-0479  
[jonathan.w.carney@wv.gov](mailto:jonathan.w.carney@wv.gov)

**Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Response to Comments (Statement of Basis)**

Not applicable.