Fact Sheet

For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

 Permit Number: R30-10700182-2022
 Application Received: December 01, 2021
 Plant Identification Number: 03-054-10700182
 Permittee: The Chemours Company FC, LLC
 Facility Name: Washington Works
 Business Unit: Power and Service Support (Part 10 of 14)
 Mailing Address: P.O. Box 1217, Washington, WV 26181-1217

Revised: N/A

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 422.27 km Easting • 4,346.57 km Northing • Zone 17
Directions: Route 68 west from Parkersburg to intersection of Route 892. Continue west on Route 892 with the plant being on the north side about one mile from the intersection of Routes 68 and 892.

Facility Description

Power and Services manages and operates the plant infrastructure to support the operating business units. As part of these operations, Power and Services operates gas boilers to produce steam for on-site use. Power and Services personnel also operate an industrial wastewater treatment facility, a sanitary wastewater treatment facility, an air compressor system to supply plant air, and a water treatment facility to supply treated water for both process uses and sanitary uses on-site.
### Emissions Summary

<table>
<thead>
<tr>
<th>Regulated Pollutants</th>
<th>Potential Emissions</th>
<th>2021 Actual Emissions¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>359.3</td>
<td>105.28</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOₓ)</td>
<td>284</td>
<td>332.26</td>
</tr>
<tr>
<td>Particulate Matter (PM₂.₅)</td>
<td>0.15</td>
<td>1.54</td>
</tr>
<tr>
<td>Particulate Matter (PM₁₀)</td>
<td>7.65</td>
<td>6.63</td>
</tr>
<tr>
<td>Total Particulate Matter (TSP)</td>
<td>20.22</td>
<td>13.32</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO₂)</td>
<td>11.53</td>
<td>375.71</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>699.58</td>
<td>184.26</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Hazardous Air Pollutants</th>
<th>Potential Emissions</th>
<th>2021 Actual Emissions¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>0.04</td>
<td>0.02</td>
</tr>
<tr>
<td>Ethanbenzene</td>
<td>&lt;0.01</td>
<td>&lt;0.01</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>25.03</td>
<td>0.95</td>
</tr>
<tr>
<td>Methanol</td>
<td>7.5</td>
<td>6.28</td>
</tr>
<tr>
<td>Methylene Chloride</td>
<td>&lt;0.01</td>
<td>&lt;0.01</td>
</tr>
<tr>
<td>n-Hexane</td>
<td>7.02</td>
<td>2.09</td>
</tr>
<tr>
<td>Toluene</td>
<td>15.2</td>
<td>11.91</td>
</tr>
<tr>
<td>Xylene</td>
<td>0.01</td>
<td>&lt;0.01</td>
</tr>
<tr>
<td>Other HAPs</td>
<td>7.04</td>
<td>5.79</td>
</tr>
<tr>
<td>Aggregate HAPs</td>
<td>61.87</td>
<td>27.04</td>
</tr>
</tbody>
</table>

¹ – The pollutants where the actual emissions are higher than the potential emissions are due to the boilers, Sorbent silos, and Coal Handling facilities being removed in 2021.

### Title V Program Applicability Basis

Due to this facility’s potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, The Chemours Company FC, 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.

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

| Federal and State: | 45CSR2 | Opacity and PM limits for fuel burning units |
The Secretary can request any pertinent information such as annual emission inventory reporting.

WV Code § 22-5-4 (a) (14) 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

<table>
<thead>
<tr>
<th>Permit or Consent Order Number</th>
<th>Date of Issuance</th>
<th>Permit Determinations or Amendments That Affect the Permit (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>R14 - 0014</td>
<td>01/02/2002</td>
<td></td>
</tr>
<tr>
<td>R13-3223</td>
<td>12/8/2014</td>
<td></td>
</tr>
<tr>
<td>Permit or Consent Order Number</td>
<td>Date of Issuance</td>
<td>Permit Determinations or Amendments That Affect the Permit (if any)</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>----------------</td>
<td>---------------------------------------------------------------</td>
</tr>
<tr>
<td>R13-2654F</td>
<td>01/25/2022</td>
<td></td>
</tr>
<tr>
<td>R13-3416</td>
<td>11/27/2018</td>
<td></td>
</tr>
</tbody>
</table>

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**

This is the third renewal for this facility and the following changes have been made to the Title V permit.

- **Section 1.0**
  - Emission Units 475, 476, 477, 490, 491, 492, and 493 were removed from the Emission Units Table because the equipment has been decommissioned, disconnected, and is not in use.
  - Table 1.2 has been updated with the latest R13/R14 permit numbering.

- **Section 3.0**
  - The Title V Boilerplate was updated.
  - Conditions 3.7.2.a and 3.7.2.b were removed because they referenced boilers that have been decommissioned, disconnected, and are not in use.
  - Former Conditions 3.7.2.c, 3.7.2.d, 3.7.2.ee, and 3.7.2.gg have all been updated.
  - Conditions 3.7.2.j and 3.7.2.cc have been removed since the facility has decommissioned and removed Coal Handling.

- **Section 4.0**
  - Conditions 4.1.1 – 4.1.21, 4.1.24 – 4.1.25, 4.2.1 – 4.2.16, 4.3.1 – 4.3.20, 4.4.1 – 4.4.8, 4.4.10 – 4.4.20, 4.4.22 – 4.4.23, and 4.5.1 – 4.5.6 were removed.
    - These conditions were for Boilers No. 2-6, the Ash Handling System, and the Sorbent silos that have been decommissioned, disconnected, and are not in use.

- **Section 8.0**
  - Condition 8.4.2.b was updated to reflect the changes made under R13-2654F issued on January 25, 2022

- **Section 9.0**
  - Conditions 9.1.4, 9.1.8, 9.3.3, 9.4.2, 9.4.4, and 9.5.4 were updated as a result of changes to 40 C.F.R. 60 Subpart IIII, 40 C.F.R. 60 Subpart JJJJ, and 40 C.F.R. 63 Subpart ZZZZ.
The requirements of 40 C.F.R. §60.4214(d) were added as condition 9.5.5.

- Appendices
  - Former Appendices A, B, and E have been removed since the referenced equipment has been decommissioned, disconnected, and is not in use.

**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 Dc – “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.”** This subpart applies to each steam generating unit that commences construction, modification, or reconstruction after June 9, 1989 and has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. All the boilers in Power and Service Support Area have a maximum design heat input capacity of more than 100 MMBtu/hr

b. **40 C.F.R. 60, Subpart E – “Standards of Performance for Incinerators.”** The Power and Support Services Area does not operate any equipment which meets the definition of an incinerator as specified in 40 C.F.R. §60.51.


d. **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 petroleum liquid storage tanks in the Power and Service Support Area with a storage capacity greater than 151,416 liters for which construction, reconstruction, or modification commenced after May 18, 1978 and prior to July 23, 1984.

e. **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 volatile organic liquid storage tanks in the Power and Service Support Area with a storage capacity greater than or equal to 75 m³ for which construction, reconstruction, or modification commenced after July 23, 1984.

f. **40 C.F.R. 60, Subpart O – “Standards of Performance for Sewage Treatment Plants.”** The Power and Service Support Area does not operate an incineration unit or boiler to burn sludge from a municipal sewage treatment plant.

g. **40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry.”** The Power and Service Support Area does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.

h. **40 C.F.R. 60, Subpart DDD - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.”** The Power and Service Support Area does
not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.


j. **40 C.F.R. 60, Subpart CCCC** – “Standards of Performance for Commercial and Industrial Solid Waste Incineration units for Which Construction is Commenced after November 30, 1999 or for Which Modification or Reconstruction is Commenced on or After June 1, 2001.” The Power and Service Support Area does not operate a commercial and industrial solid waste incineration (CISWI) unit as defined by 40 C.F.R. §60.2265.

k. **40 C.F.R. 60, Subpart DDDD** – “Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units that Commenced Construction on or Before November 30, 1999.” The Power and Service Support Area does not operate a commercial and industrial solid waste incineration (CISWI) unit as defined by 40 C.F.R. §60.2875.

l. **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 the Power and Service Support Area.

m. **40 C.F.R. 61, Subpart FF** – “National Emission Standard for Benzene Waste Operations.” The Power and Service Support Area, specifically the Wastewater Treatment Plant, is not subject to this subpart other than the requirements of 40 C.F.R. §61.342(a) to perform an annual assessment of applicability and the record keeping requirements of 40 C.F.R. §§61.356(a) and 61.356(b).


o. **40 C.F.R. 63, Subpart G** – “National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater.” 40 C.F.R. 63, Subpart G does not apply to the Power and Service Support Area because they do not handle or treat a Group 1 wastewater stream. Applicable recordkeeping and reporting requirements for Group 2 wastewater streams are the responsibility of the producing area subject to the MACT standard and not the wastewater treatment area.

p. **40 C.F.R. 63, Subpart H** - “National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.” 40 C.F.R. 63 Subpart H does not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).


r. **40 C.F.R. 63, Subpart T** – “National Emission Standards for Halogenated Solvent Cleaning.” The Power and Service Support Area does not operate any solvent cleaning machines containing the halogenated cleaning solvents specified in 40 C.F.R. §63.460(a).
s. 40 C.F.R. 63, Subpart DD – “National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations.” This subpart applies to units that receive waste/wastewater from off-site operations for treatment or recovery and the off-site waste contains hazardous air pollutants. This subpart does not apply to the Wastewater Treatment Plant at Chemours Washington Works because the treatment of off-site wastewater is not the predominate activity performed at the Washington Works facility as required in 40 C.F.R. §63.680(a)(2)(iii)(B).


u. 40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.” The Power and Service Support Area does not produce the materials listed in 40 C.F.R. §63.1310.

v. 40 C.F.R. 63, Subpart EEEE – “National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline).” The Power and Service Support Area does not operate an organic liquids distribution (OLD) operation or does not handle material organic liquids as defined in §63.2406.

w. 40 C.F.R. 82, Subpart B - “Protection of Stratospheric Ozone.” This subpart requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing the equipment need to be licensed. The Power and Service Support Area does not conduct motor vehicle maintenance involving CFCs on site.

x. 40 C.F.R. 82, Subpart C – “Protection of Stratospheric Ozone.” This subpart bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. The Power and Service Support Area does not use, manufacture, nor distribute these materials.

y. 45CSR6 – “To Prevent and Control Air Pollution from Combustion of Refuse.” The Power and Service Support Area does not engage in the combustion of refuse in any installation or equipment.

z. 45CSR18 – “To Prevent and Control Emissions from Commercial and Industrial Solid Waste Incineration Units.” The Power and Service Support Area does not operate any equipment defined by 45CSR§18-2.11 as a commercial and industrial solid waste incineration (CISWI) unit.

aa. 45CSR§21-40 – “Other Facilities that Emit Volatile Organic Compound (VOC).” None of the emission sources in the Power and Service Support Area have maximum theoretical emissions of 6 pounds per hour or more and are subject to the requirements of this section. In addition, 45CSR§21-40.1.d. specifically exempts wastewater treatment facilities from the requirements in 45CSR§21-40.

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: October 31, 2022
   Ending Date:   November 30, 2022

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

   Nikki B. Moats
   West Virginia Department of Environmental Protection
   Division of Air Quality
   601 57th Street SE
   Charleston, WV  25304
   nikki.b.moats@wv.gov
   304/926-0499 ext. 41282

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)
   No comments received.