

# Fact Sheet



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

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

Application Received: **April 25, 2014**

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

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

Facility Name: **Facilities, Construction, and Support (FC&S) (Part 12 of 14)**

Mailing Address: **P. O. Box 1217, 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: Route 68 west from Parkersburg to intersection of Route 862. Continue west on Route 892 with the plant being on the north side about one mile from the intersection of Routes 68 and 862.

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### **Facility Description**

Facilities, Construction and Support provides specialized maintenance services and construction capabilities to the Manufacturing units at the DuPont Washington Works. Facilities, Construction, and Support (FC&S) performs operations such as welding, painting, insulation fabrication and installation, and vehicle refueling in support of specific projects and specific maintenance requirements for other business units at the site. Included in this group are contracted services that are brought on-site for specialized activities of short duration, such as large component cleaning, sandblasting and painting.

**Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2013 Actual Emissions</b>
Carbon Monoxide (CO)	0.035	0.0018
Nitrogen Oxides (NO <sub>x</sub> )	0.087	0.0
Particulate Matter (PM <sub>2.5</sub> )	3.38	0.048
Particulate Matter (PM <sub>10</sub> )	3.38	0.081
Total Particulate Matter (TSP)	3.42	0.10
Sulfur Dioxide (SO <sub>2</sub> )	0.0071	0
Volatile Organic Compounds (VOC)	45.7	0.36

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

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2013 Actual Emissions</b>
Cumene	0.0018	0.0018
Ethylene Glycol	0.001	0.001
Glycol Ethers	0.0	0
Toluene	0.0212	0.0212
Ethyl Benzene	0.008	0.008
Xylenes	0.0372	0.0372
Methyl Isobutyl Ketone	0.0	0
Methyl Ethyl Ketone	0.053	0
Methylene Chloride	0.0	0
Methyl Methacrylate	0.0	0
Chromium	0.0003	0.0003
Chromium VI	0	0
Cobalt	0	0
Manganese	0.0014	0.0028
Nickel	0.0002	0
Benzene	0.0009	0.0009
n-Hexane	0.0015	0.0015

Regulated Pollutants other than Criteria and HAP	Potential Emissions	2013 Actual Emissions
Ozone Depleting Compounds (ODC)	0.025	0

<sup>1</sup>*PM<sub>2.5</sub> and PM<sub>10</sub> are components of TSP.*

<sup>2</sup>*For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section*

### Title V Program Applicability Basis

This facility has the facility-wide potential to emit over 100 tons per year of criteria pollutants (CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC), over 10 tons per year of a single Hazardous Air Pollutant (HAP), and over 25 tons per year of aggregated Hazardous Air Pollutants (HAPs). Due to this facility's potential to emit over 100 tons per year of criteria pollutants (CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC), over 10 tons per year of a single Hazardous Air Pollutant (HAP), and over 25 tons per year of aggregated Hazardous Air Pollutants (HAPs), DuPont 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:	45CSR2	Particulate matter and opacity limits for indirect heat exchangers.
	45CSR6	Open burning prohibited.
	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR11	Standby plans for emergency episodes.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR21, Section 23	Control of VOC emissions from gasoline dispensing facility.
	45CSR30	Operating permit requirement.
State Only:	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances.
	45CSR4	No objectionable odors.
	45CSR21, Section 30	Control of VOC emissions from cold and solvent metal cleaning.

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

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

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
N/A	N/A	N/A

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

- Emission Unit IDs- VP004, V238G07 and VMIS02 have been removed from the Emission Unit Table.
  - VP004 was removed from service and decommissioned.
  - V238G07 is a used motor oil tank that is used solely for maintenance activities covered under the maintenance insignificant activities as defined by the R30 program. The vessel is used for temporary storage of heavy weight used engine oils removed from motor vehicles and has no applicable requirements.
  - VMIS02 is an insulation band saw that was idled when the insulation shop where it was located was closed.
- In the Emission Unit Table, Emission Unit ID- VTIS02 has been corrected to VTIS01 due to typographical error.
- VP004E and VMIS01E were removed from Conditions 4.1.1, 4.1.2, and 4.2.2 as this equipment has been removed.
- 40 CFR Part 64 – Since CAM was addressed in the previous renewal and there were no modifications to the facility that would have triggered a CAM review subsequent to the previous renewal, a CAM evaluation was not made.

### 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 petroleum liquid storage tanks in Facilities, Construction, and Support constructed, reconstructed or modified between these dates.
- 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 petroleum liquid storage tanks in Facilities, Construction, and Support constructed, reconstructed or modified between these dates with a capacity greater than 40,000 gallons.
- 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 volatile

organic liquid storage tanks constructed in Facilities, Construction, and Support after the effective date with a design capacity greater than 75 m<sup>3</sup> (19,812.9 gallons).

- d. 40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry.” Facilities, Construction, and Support 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.” Facilities, Construction, and Support 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.” Facilities, Construction, and Support does not produce any of the chemicals listed in §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 Facilities, Construction, and Support
- h. 40 C.F.R. 63, Subpart F – “National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry.” 40 C.F.R. 63 Subparts F, G, and H do 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).
- i. 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 Subparts F, G, and H do 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).
- j. 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 manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- k. 40 C.F.R. 63, Subpart DD – “National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations.” Facilities, Construction, and Support (FC&S) 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).
- l. 40 C.F.R. 63, Subpart YY – “National Emission Standards for Hazardous Air Pollutant for Source Categories: Generic Maximum Achievable Control Technology Standards.” Facilities, Construction, and Support is not one of the source categories and affected sources specified in 40 C.F.R. §§63.1103(a) through (h).
- m. 40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.” Facilities, Construction, and Support does not produce the materials listed in 40 C.F.R. §63.1310.

- n. 40 C.F.R. 63, Subpart EEEE – “National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline).” Facilities, Construction, and Support does not operate an organic liquids distribution (OLD) operation or does not handle material organic liquids as defined in §63.2406.
- o. 40 C.F.R. 63, Subpart PPPP – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.” Facilities, Construction, and Support does not produce an intermediate or final product that meets the definition of a “surface coated” plastic part.
- p. 40 C.F.R. 63, Subpart WWWW - “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” Facilities, Construction, and Support 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.
- q. 40 C.F.R. 63, Subpart ZZZZ – “National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines.” Facilities, Construction, and Support does not have a stationary Reciprocating Internal Combustion Engine (RICE) as defined by 40 C.F.R. §63.6675.
- r. 40 C.F.R. 63, Subpart GGGG – “National Emission Standards for Hazardous Air Pollutants: Site Remediation.” Facilities, Construction, and Support does not conduct site remediation as defined by 40 C.F.R. §63.7957 that meets all three of the conditions specified in 40 C.F.R. §§63.7881(a)(1) through (a)(3).
- s. 40 C.F.R. 63, Subpart HHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” Facilities, Construction, and Support does not produce, blend, or manufacture coatings as part of the manufacturing process.
- t. 40 C.F.R. 63, Subpart NNNN – “National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production.” Facilities, Construction, and Support is not an HCl production facility as defined by 40 C.F.R. §63.9075.
- u. 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. Facilities, Construction, and Support does not conduct motor vehicle maintenance involving CFCs on site.
- v. 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. Facilities, Construction, and Support does not use, manufacture, nor distribute these materials.
- w. 45CSR10 – “To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.” The “Hotsy” Propane Hot Water Cleaner(V238G03) has a design heat input of 0.4mmBtu/hr. Per 45CSR§10-10.1, any fuel burning unit with a design heat input of less than 10mmBtu/hr is exempt from section 3 and sections 6 through 8 of 45CSR10.
- x. 45CSR16 – “Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60.” The FC&S Area is not subject to any requirements under 40 C.F.R. 60.

- y. 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 FC&S Area is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.
- z. 45CSR§21-40 – “Other Facilities that Emit Volatile Organic Compound (VOC).” None of the emission sources in FC&S have maximum theoretical emissions of 6 pounds per hour or more and are not subject to the requirements of this section.
- aa. 45CSR§27-4.1 – “To Prevent and Control the Emissions of Toxic Air Pollutants: Fugitive Emissions of Toxic Air Pollutants.” The equipment in the FC&S Area is not in “toxic air pollutant service” as defined by 45CSR§27-2.11 and is not subject to the requirements of 45CSR§27-4.1.
- bb. 40 C.F.R.63, Subpart FFFF – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.” Facilities, Construction, and Support does not manufacture any material or family of materials defined in §63.2435(b)(1)(i) through (v).
- cc. 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 Facilities, Construction, and Support subject to the requirements of this rule.
- dd. 45CSR§21-19 – “Other Facilities that Emit Volatile Organic Compound (VOC).” The operations of Facilities, Construction, and Support are outside of the SIC grouping to which this section of 45CSR21 applies.

**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 19, 2014  
Ending Date: January 20, 2015

**Point of Contact**

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

Beena Modi  
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. 1228 • Fax: 304/926-0478  
Beena.j.modi@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)**

None