

Fact Sheet



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

Permit Number: **R30-10700001-2021**

Application Received: **May 14, 2020**

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

Permittee: **DuPont Specialty Products USA, LLC**

Facility Name: **Washington Works, Specialty Compounding Division (Part 8 of 14)**

Mailing Address: **P.O. Box 2800, Washington, West Virginia 26181-2800**

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

DuPont Washington Works is a multiple business, multiple product line facility that produces plastic resins and their associated feedstock materials. DuPont Washington Works divided the initial Title V Permit Application into fourteen separate business units, each of which received a Title V Permit. This permit is Group 8 of 14, Specialty Compounding Division, which is a segment of DuPont Washington Works that produces polymer blends and mixtures through the use of mixing and extrusion facilities. Specialty Compounding Division takes raw materials, generally in a pellet or powder form, and mixes them together to create high performance plastic blends and polymers for use in automotive, aerospace, and other commercial manufacturing efforts located off-site.

In 2015 several business units of the facility were sold to The Chemours Company FC, LLC (10700182). The Specialty Compounding Division (8 of 14) is still owned by DuPont.

Emissions Summary

Specialty Compounding Division Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2019 Actual Emissions
Carbon Monoxide (CO)	2.84	1.50
Nitrogen Oxides (NO _x)	1.35	0.84
Particulate Matter (PM _{2.5})	2.37	0.30
Particulate Matter (PM ₁₀)	2.91	0.74
Total Particulate Matter (TSP)	15.77	3.09
Sulfur Dioxide (SO ₂)	0.01	0.00
Volatile Organic Compounds (VOC)	5.41	1.48

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2019 Actual Emissions
Acrylonitrile	0.05	0.02
Acetaldehyde	0.05	0.02
Aniline	2.65	0.02
Benzene	0.05	0.00
Formaldehyde	3.92	0.36
Total HAPs	6.72	0.42

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

Title V Program Applicability Basis

Due to the facility-wide potential to emit over 100 TPY of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 TPY of aggregate HAPs, DuPont Specialty Products USA, LLC's 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 Air Pollution from Combustion of Fuel in Indirect Heat Exchangers
45CSR6	Open burning prohibited.
45CSR7	Particulate matter and opacity limits for manufacturing sources.
45CSR11	Standby plans for emergency episodes.

	45CSR13 WV Code § 22-5-4 (a) (14)	Construction permit requirements. The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30 40 C.F.R. Part 61 40 C.F.R. Part 82, Subpart F	Operating permit requirement. Asbestos inspection and removal Ozone depleting substances
State Only:	45CSR4 45CSR21, Section 30 45CSR27	No objectionable odors. Cold and Solvent Metal Cleaning. Best Available Technology (BAT) for Toxic Air Pollutants

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>)
R13-1533N	May 30, 2019	
R13-2617M	July 20, 2020	

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 Renewal includes the following changes (from R13-2617M) in this permit:

- (1) Permit R13-2617M contains Facility-Wide Rule 21 and 27 requirements. There is no change in this permit except:

Corrected "45CSR§13-5.11." to "45CSR§13-5.10." in Condition's 4.1.11 citation.

Non-Applicability Determinations

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

1. Permit Shield (from requirement 3.7.2):
 - 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 the Specialty Compounding Division.
 - 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 the Specialty Compounding Division.
 - 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 in the Specialty Compounding Division.
 - d. 40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry.” The Specialty Compounding Division 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.” The Specialty Compounding Division 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.” The Specialty Compounding Division 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 the Specialty Compounding Division.
 - 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.” The Specialty Compounding Division 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.” The Specialty Compounding Division 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.” The Specialty Compounding Division 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).” The Specialty Compounding Division 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.” The Specialty Compounding Division 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.” The Specialty Compounding Division 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.” The Specialty Compounding Division 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.” The Specialty Compounding Division 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.” The Specialty Compounding Division 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.” The Specialty Compounding Division 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. The Specialty Compounding Division 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. The Specialty Compounding Division does not use, manufacture, nor distribute these materials.
- w. 45CSR10 - "To Prevent and Control Air Pollution from the Emission of Sulfur Oxides." The Specialty Compounding Division does not contain any fuel burning units subject to the sulfur dioxide weight emission standards of 45CSR§10-3. Also, per 45CSR§10-4.1.e, manufacturing process source operations in the Specialty Compounding Division are exempt from the sulfur dioxide concentration limits of 45CSR§10-4.1 because the potential to emit of sulfur dioxide is less than 500 pounds per year.
- x. 45CSR16 - "Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60." The Specialty Compounding Division 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 Specialty Compounding Division 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 Specialty Compounding Division 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 Specialty Compounding Division is not in "toxic air pollutant service" as defined by 45CSR§27-2.11 is not subject to the requirements of 45CSR§27-4.1.
- bb. 40 C.F.R. Part 64 - *Compliance Assurance Monitoring*. None of the emission units listed in the renewal application have pre-control device emissions of a regulated air pollutant greater than the major source threshold for that pollutant; therefore, none of the emission units meet applicability criterion of 40 C.F.R. §64.2(a)(3). Thus CAM is not applicable to any emission unit listed in the renewal application.
- cc. 40 C.F.R. 63, Subpart DDDDD - "National Emission Standards for Hazardous Air Pollutants: Industrial/Commercial/Institutional Boilers and Process Heaters" is not applicable to natural gas fired hot water generators (Emission Unit IDs S293-S-060, S293-S-061, and S293-S-062) per §63.7491(d) and §63.7575. The generators are tankless units used on demand for comfort heating of the living space in the building. They are exempt from the requirements of the subpart because they fit the definition of a "hot water heater" in §63.7575: "Hot water heater also means a tankless unit that provides on demand hot water".

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: January 5, 2021
Ending Date: February 4, 2021

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 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41283
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