

# Fact Sheet



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

Permit Number: **R30-10700001-2018**  
Title V Application Received: **January 11, 2017**  
Plant Identification Number: **10700001**  
Permittee: **E. I. duPont de Nemours and Company**  
Facility Name: **Washington Works**  
Business Unit: **Acetal Resin Production (Part 3 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 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.

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### Facility Description

The Delrin® Business unit is divided into three areas which work together to produce a finished acetal product. The first area is the **Formaldehyde Area** which produces the formaldehyde to be fed to the process. The formaldehyde is used in the **Chemical Area** which conditions the formaldehyde and converts it into raw polymer. The raw polymer is then sent to the **Finishing Area** where it is extruded with additives into finished pellets which are then sold.

#### Formaldehyde Area

The Delrin® formaldehyde plant is designed to produce a formaldehyde/water solution. Heat of reaction is recovered to produce steam used in the Delrin® Chemical Area. The plant consists of multiple reactor loops each containing a reactor, blower, vaporizer, and a heat transfer fluid condenser/steam generator. Common equipment to the reactor loops includes absorbers, a catalytic converter, a boiler feed water tank, a caustic tank, and a heat transfer fluid heater and storage tank. Support facilities include a cooling tower, methanol storage tanks, and formaldehyde tanks. Methanol is normally received by barge and infrequently by tank truck. It is stored in tanks. Formaldehyde is produced by air oxidation of methanol over catalyst. The methanol gas feedstream is converted to a gas stream containing formaldehyde, unreacted methanol, and reaction byproducts. The hot reactor gas passes through the vaporizer to provide heat to vaporize the liquid methanol feed. The gases then flow through the absorbers, where formaldehyde and water vapor are

removed from the gas stream by scrubbing. Absorber pH is controlled by adding caustic solution. The liquid product stream is adjusted to a specified formaldehyde concentration after leaving the absorbers by mixing with a dilute formaldehyde stream. The aqueous formaldehyde product is stored in the formaldehyde tank farm for feed to the Delrin<sup>®</sup> Chemical Area. The process gas which exits the absorbers is primarily nitrogen and oxygen, with small amounts of formaldehyde, water, methanol, carbon monoxide, and dimethyl ether. Most of the exit gas is mixed with air and returned to the reactor via the blower. The amount of recycle gas is controlled to maintain non-explosive conditions. As the process gas is returned to the reactor, it passes through a vaporizer where fresh methanol is added. As previously noted, heat is supplied by the hot reactor gases. Additional heat of reaction is removed from the reactor by boiling heat transfer fluid in the reactor shell. The heat transfer fluid vapor passes to a condenser where it is condensed by boiler feed water generating steam that is used elsewhere in the plant. Process gas that is not recycled to the reactor loops flows through the catalytic converter system for air emissions control.

### **Chemical Area**

The polymerization of Acetal resin homopolymer starts with the purification of the formaldehyde monomer stream. The general feedstock for the purification stream may be either manufactured on site or trucked into the facility after purchase on the open market. This liquid solution of formaldehyde is then treated in an extraction column where an aliphatic alcohol mixture is used to selectively extract the formaldehyde from the water by forming an alcohol mixture by forming an alcohol hemiformal. This alcohol hemiformal is then dried to remove water and impurities that are found in almost all formaldehyde. After drying the material, the purified hemiformal is then thermally decomposed to generate essentially pure formaldehyde vapor through the use of a pyrolyzer and partial condenser system. A scrubber system is used to absorb the monomer generated during the start up of the polymerization process. The formaldehyde vapor exiting the partial condenser is sent to a polymerization vessel that contains a commercial heptane solvent blend as the carrier solvent for the forming homopolymer particles. This polymerization is cooled to remove the exothermic heat of reaction evolved in the polymerization. The polymerization vessel operates continuously with both formaldehyde and solvent feeds occurring continuously. A solvent and polymer slurry is constantly withdrawn from the polymerization vessel and sent to isolation to separate the polymer. The recovered solvent is recycled for further use in the process. Periodically the polymerization vessel must be shutdown to clear the vessel of polymer build up. This clean out is performed through a condenser based emission control system with a different emission point. The homopolymer and solvent slurry mixture produced in the polymerizer during normal operation is fed to a separation device that isolates the solids and drops them into a conveyor/dryer system. The solids are placed into a set of intermediate storage bins. These bins feed a conveying system that transports the intermediate polymer (raw fluff) to a reactor processing vessel that “caps” the homopolymer chains with a terminating agent to improve the stability of the polymer chains. The capping is done in with excess of the required amount of capping agent present. The capping reagent and evolved formaldehyde are recovered for further purification and reuse. The formaldehyde recovered is sent to other parts of the process for concentration and recycled back to the feed tank of the initial process. The capped polymer exits from the capping reactor and is treated to reduce the residual reactants present on the polymer. Upon exiting this final process the finished product is ready for either conversion to another form or the direct sale or transfer to other processors. This is also the point of definition for the final product for the Acetal MACT (40 CFR 63 Subpart YY) standard.

### **Finishing Area**

The capped fluff is loaded out into boxes for temporary storage or shipment; or into rail cars for temporary storage or shipment. It may also be loaded into sea-land boxes for shipment overseas, or fed to a set of conversion lines in which other materials and modifiers are added to the fluff to produce modified polymers in pellet form. In the finishing area the pelletized polymer is produced by five extrusion lines that are used to alter the form of the product produced in the plant through the use of additives, heat, and pressure. These modified products exhibit improved characteristics that improve their market value. Raw materials for the extrusion system are received in boxes, bags, leverpaks, and by pneumatic transport from other portions of the facility. The materials are fed directly to extruders through metering devices, or used to make blends for a similar incorporation into a final product. Raw materials for the extrusion lines include modifiers, colors, and base plastic materials. Some finished material from the polymerization unit is packed out directly for shipment to other processors or for interim storage. The extrusion feed material is fed to the extruders where the materials are thoroughly mixed and converted to another product form by extrusion. The product, usually in the form of pellets, is dried, screened, conveyed, and packaged into either shipping or storage containers. The material is then shipped to other users or to customers.

**Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2016 Actual Emissions</b>
	<b>Part 3 Only</b>	<b>Facility Wide</b>
Carbon Monoxide (CO)	67.87	14.45
Nitrogen Oxides (NO <sub>x</sub> )	48.30	41.03
Particulate Matter (PM <sub>2.5</sub> )	14.84	9.30
Particulate Matter (PM <sub>10</sub> )	14.84	10.81
Total Particulate Matter (TSP)	14.84	20.11
Sulfur Dioxide (SO <sub>2</sub> )	11.30	0.78
Volatile Organic Compounds (VOC)	237.84	80.93

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

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2016 Actual Emissions</b>
	<b>Part 3 Only</b>	<b>Facility Wide</b>
Formaldehyde	19.05	3.75
Total HAP's	30.83	10.09

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

**Title V Program Applicability Basis**

This facility has the potential to emit 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year aggregate HAPs. Due to this facility's 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, 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.

Acetal Resin Production (Part 3 of 14) 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.
	45CSR10	Sulfur dioxide limits.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor sources.
	45CSR16	Emission Standards for New Stationary Sources Pursuant to 40 C.F.R. Part 60.

	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63.
	40 C.F.R. Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.
	40 C.F.R. Part 60, Subpart Kb	Standards of Performance for Volatile Liquid Storage Vessels.
	40 C.F.R. Part 60, Subpart VV	Standards of Performance for SOCM I.
	40 C.F.R. Part 60, Subpart III	Standards of Performance for VOC Emissions from SOCM I Air Oxidation Unit Processes.
	40 C.F.R. Part 60, Subpart NNN	Standards of Performance for VOC Emissions from SOCM I Distillation Operations.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart F, G, H	Hazardous Organic NESHAP (HON)
	40 C.F.R. Part 63, Subpart YY	Generic MACT
	40 C.F.R. Part 63, Subpart SS	NESHAP for closed vent systems, control devices, recovery devices, and routing to a fuel gas system or process.
	40 C.F.R. Part 63, Subpart UU	NESHAP for equipment leaks – control level 2 standards.
	40 C.F.R. Part 63, Subpart EEE	Hazardous Waste Combustors MACT.
	40 C.F.R. Part 63, Subpart EEEE	Organic Liquid Distribution (OLD) MACT.
	40 C.F.R. Part 63, Subpart ZZZZ	Reciprocating Internal Combustions Engines MACT.
	40 C.F.R. Part 63, Subpart DDDDD	Boilers and Process Heaters MACT.
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR§§21-37 and 40	Control of VOC Emissions
	45CSR27	Best Available Technology (BAT) for TAPs

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> )
R13-1596E	March 15, 2011	
R13-1849N	August 28, 2014	
R13-2381H	January 6, 2015	
R13-2617J	October 5, 2017	

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

Changes made to the Title V Permit since the last revision are summarized below:

The Acetal Resins facility of DuPont Washington Works has a boiler that was installed in 2001 primarily to burn a waste organic liquid that is presently classified per RCRA, as a hazardous waste. As a supplementary function, the boiler also serves as the air pollution control device for several process vents that are subject to Federal MACT standards. In the equipment table for the Title V permit the boiler itself is referred to as source ID "DOM" with emission point ID "DOME." When the boiler is referred to as a control device in this table, the device ID is "DOMC" with emission point "DOME."

When the boiler is burning waste organic liquid, it is subject to 40 CFR 63 subpart EEE for Hazardous Waste Combustors. When the boiler is controlling emissions from the MACT-subject vents it is subject to the vent provisions of the Acetal Resins section of the Generic MACT, 40CFR63 subpart YY with specific requirements from subpart SS. The boiler is also potentially subject to the requirements of the 40CFR63 subpart DDDDD Boiler MACT.

Under normal conditions the boiler addresses both the liquid and process vent feeds at the same time and must comply with an overlapping set of operating and monitoring requirements for subparts EEE and YY/SS. The Hazardous Waste rules generally set the more stringent requirements. At times when the feed of liquid waste is suspended from the boiler, but when process vents are still present from the YY unit, the boiler is subject to the requirements of the YY and SS rules, as well as being subject to the requirements of the DDDDD Boiler MACT.

All initial compliance tests and notices have been conducted and submitted. The MACT EEE and YY rules both require on-going semiannual reporting. The MACT EEE rule requires an annual RATA for the CO CEMS. The MACT DDDDD rule requires a boiler tune-up every 5 years.

Changes due to 40CFR63, Subpart EEE (Hazardous Waste Combustor MACT):

1. Moved the minimum operating temperature for the comparable fuels boiler (DOMC) from Condition 5.2.8 to Condition 5.1.10. This was done to specify that the limit comes from the Generic MACT and not the hazardous waste combustor MACT.
2. Added Condition 5.1.16 to include requirements for operating ranges. This includes minimum operating temperature, maximum gas flow and feed rate, and minimum steam pressure.

3. Added Condition 5.1.17 to require that the combustion zone is sealed to prevent leaks when combusting hazardous waste.
4. Added Condition 5.1.18 to include hazardous waste combustion emission standards, one-time calculation of hazardous waste resident time, time requirements of burning hazardous waste if the permittee makes an adverse change to the unit, the ability to petition to obtain written approval to burn hazardous waste prior to submitting a Notification of Compliance.
5. Added Condition 5.1.19 to require that if the permittee does not submit the Notification of Compliance, that hazardous waste burning must cease immediately.
6. Added Condition 5.1.20 to incorporate the hazardous waste combustion start-up, shutdown, and malfunction plan requirements.
7. Added Condition 5.1.21 to require that the hazardous waste combustor be operated with an automatic cutoff as well as scenarios of when it must be used.
8. Added Condition 5.1.22 to require the Permittee to investigate any causes of automatic waste feed cutoff failures.
9. Added Condition 5.1.23 to add automatic cutoff requirements that happen during malfunctions.
10. Added Condition 5.1.24 to add waste feed restrictions, automatic waste feed cutoffs, and interlocks in their SSMP.
11. Added a statement in Condition 5.2.8 that those requirements apply for the Boiler (DOMC) when it is not combusting liquid hazardous waste.
12. Added new Condition 5.2.16 for hazardous waste boiler monitoring requirements. They include:
  - a) 5.2.16.1 – The permittee shall establish operating limits to meet the destruction and removal efficiency standards for dioxin and furan, carbon monoxide, and hydrocarbons. Limits also include minimum combustion temperature, maximum flowrate or production rate, maximum hazardous waste feed rate, and operation of a waste firing system.
  - b) 5.2.16.2 – The Permittee will use a carbon monoxide and oxygen continuous emissions monitoring system (CEMS) to demonstrate compliance with the dioxin and furan limits and the hydrocarbon limits of 40CFR63, Subpart EEE.
  - c) 5.2.16.3 – The permittee will use a particulate matter (PM) CEMS when EPA promulgates specification and requirements applicable to PM CEMS.
  - d) 5.2.16.4 – The Permittee will use continuous monitoring systems (CMS) to show compliance with various operating parameter limits.
  - e) 5.2.16.5 – The Permittee was given approval by WV DAQ for their initial Feedstream Analysis Plan (FAP).
  - f) 5.2.16.6 – The Permittee must use the averaging periods to periodically analyze the hazardous waste streams for the maximum theoretical emission concentration (MTEC) to show compliance with emission based standards.
  - g) 5.2.16.7 – The Permittee must still monitor during interruption of hazardous waste feeds in order to determine that the operating parameters and emissions levels are within the specified limits in order to restart the hazardous waste feed.
  - h) 5.2.16.8 – The Permittee is required to determine the value of the parameter and use the data collected by determining the feed rate to the Comparable Fuel Boiler.
  - i) 5.2.16.9 – The Permittee is not required to monitor levels of metals or chlorine if they meet the feed rate limits of natural gas, process air, and feedstreams from vapor recovery systems.
  - j) 5.2.16.10 – The Permittee must conduct performance evaluations using the quality control and audit procedures described.
  - k) 5.2.16.11 – The Permittee must use the provisions of 40 C.F.R §63.8(b) with regards to monitoring.
  - l) 5.2.16.12 - The Permittee must use the provisions of 40 C.F.R §63.8(c) with regards to CEMS.

- m) 5.2.16.13 - The Permittee must use the provisions of 40 C.F.R §63.8(g) with regards to the reduction of monitoring data.
  - n) 5.2.16.14 - The Permittee must complete an investigation in order to minimize exceedances after each set of 10.
13. New Condition 5.2.17 specifies the type of training and certification to be used for the hazardous waste combustor training program.
14. New Condition 5.2.18 requires the Permittee to prepare and operate according to an operation and maintenance plan to be used while combusting hazardous waste.
15. Revised existing Condition 5.3.5 to identify alternate submission times of test protocols and times of notifications of actual test dates. The test protocol will be submitted at least one year before the performance test and the public will be notified 60 days before initiation of the test.
16. New Condition 5.3.17.1 specifies how the Permittee must conduct the comprehensive performance tests. The Permittee must commence future performance tests no later than 61 months after starting the previous one. The test must be completed within 60 days of commencement. The Permittee must test if there are any planned changes that could affect compliance with emission standards. The Permittee must prepare a site-specific test plan and make the plan available to the public for review for 60 calendar days. The test must include normal chlorine feed rate under normal conditions. They may test under two or more operating modes. Before obtaining the performance test data, the Boiler must be operated under the operating parameters for which the limits are established.
17. New Condition 5.3.17.2 requires the Permittee to meet the performance testing requirements as listed in 40 C.F.R. §63.1208.
18. New Condition 5.3.17.3 requires the Permittee to repeat the dioxin/furan emissions test for any change in the design or operation that may increase those emissions.
19. New Condition 5.3.17.4 requires the Permittee to conduct a Destruction and Reduction Efficiency (DRE) performance test only once as long as the Permittee does not modify the source in a manner that could cause the facility to no longer achieve the DRE standard.
20. New Condition 5.3.18 requires the permittee to test the automatic waste feed cutoff system (AWFCO). The Permittee has documented justification for the monthly test option.
21. Existing Condition 5.4.16 was amended to specify that records need to be maintained for the non-continuous emission monitoring system (non-CEMS).
22. New Condition 5.4.31 has been added to incorporate the recordkeeping requirements. These include:
- a) 5.4.31.1 - Changes that will not adversely affect compliance
  - b) 5.4.31.2 - Results of DRE tests
  - c) 5.4.31.3 - Hazardous waste residence time
  - d) 5.4.31.4 - The AWFCO operability test results
  - e) 5.4.31.5 - The method used to control combustion system leaks
  - f) 5.4.31.6 - The SSMP in the operating record
  - g) 5.4.31.7 - The findings and corrective measures in the operating record of any investigation of an AWFCO event that results in an exceedance
  - h) 5.4.31.8 - The results of investigation(s) and evaluation(s) of malfunctions
  - i) 5.4.31.9 - The operator training and certification program
  - j) 5.4.31.10 - The operations and maintenance plan
  - k) 5.4.31.11 - The approved feedstream analysis plan
  - l) 5.4.31.12 - The Documentation of Compliance
  - m) 5.4.31.13 - When a change in the mode of combustion operation occurs
  - n) 5.4.31.14 - All measurements from the CEMS and other CMS devices during combustion
  - o) 5.4.31.15 - Gas flow rates, feedstream flow rates, one minute averages of CEMS and CMS monitoring data, daily CD and ZD checks, periodic maintenance, results of maintenance audits, and results conducted per the FAP plan.
23. New Condition 5.5.8 has been added to incorporate the reporting requirements. These include:
- a) 5.5.8.1 - Notification of Compliance (NOC) for each subsequent comprehensive performance test
  - b) 5.5.8.2 - A requirement to submit performance tests within 90 business days of completion of said test
  - c) 5.5.8.3 - Documentation of compliance with the emission standards and CMS, as well as the operating parameter limits
  - d) 5.5.8.4 - The results of the one-time dioxin/furan emissions test
  - e) 5.5.8.5 - The method used to control combustion system leaks
  - f) 5.5.8.6 - The residence time

24. New Condition 5.5.9 requires the Permittee to submit performance testing plans at least one year before the scheduled testing with exceptions as given in the Condition.
25. New Condition 5.5.10 requires the Permittee to submit a notification of intention to conduct the comprehensive performance test at least 60 calendar days before the test is scheduled to begin.
26. New Condition 5.5.11 requires the Permittee to provide notification at least 60 days prior to a change in the design, operation, or maintenance practices of the boiler.
27. New Condition 5.5.12 requires the Permittee to submit a written report within 5 calendar days of the results of investigation and corrective measures taken for each set of 10 exceedances of an emissions standard or operating requirement.
28. New Condition 5.5.13 requires the Permittee to submit an excess emissions report including a summary of the investigation and evaluations, and any changes to the SSMP.
29. New Condition 5.5.14 requires the Permittee to report the feedstream analysis plan for review and approval if requested.

Other Changes:

1. Removed the EPA email address from Condition 3.5.6.
2. Edited the requirements listed in the Permit Shield in Condition 3.7.2.
3. Revised the page numbers.
4. Section 1.2 has been updated to identify the most current version of the R13-2617J Permit. There were no changes made to any equipment in the Part 3 of 14 Permit due to the modification of R13-2617I to R13-2617J.

**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 the Acetal Resin Production Area.
- 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 Acetal Resin Production Area.
- c. 40 C.F.R. 60, Subpart DDD - "Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry." The Acetal Resin Production Area does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
- d. 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 Acetal Resin Production Area.
- e. 40 C.F.R. 63, Subpart DD - "National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations." The Acetal Resin Production 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).
- f. 40 C.F.R. 63, Subpart JJJ - "National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins." The Acetal Resin Production Area does not produce the materials listed in 40 C.F.R. §63.1310.



- g. 40 C.F.R. 63, Subpart PPPP – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.” The Acetal Resin Production Area does not produce an intermediate or final product that meets the definition of a “surface coated” plastic part.
- h. 40 C.F.R. 63, Subpart WWWW - “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” The Acetal Resin Production 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.
- i. 40 C.F.R. 63, Subpart GGGG – “National Emission Standards for Hazardous Air Pollutants: Site Remediation.” The Acetal Resin Production Area 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).
- j. 40 C.F.R. 63, Subpart HHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” The Acetal Resin Production Area does not produce, blend, or manufacture coatings as part of the manufacturing process.
- k. 40 C.F.R. 63, Subpart NNNN – “National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production.” The Acetal Resin Production Area is not an HCl production facility as defined by 40 C.F.R. §63.9075.
- l. 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 Acetal Resin Production Area does not conduct motor vehicle maintenance involving CFCs on site.
- m. 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 Acetal Resin Production Area does not use, manufacture, nor distribute these materials.
- n. 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 Acetal Resin Production Area is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.
- o. 40 C.F.R. 63, Subpart EEEE – “National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).” Storage tanks DIN, DIR, and DIS are existing tanks with a design capacity greater than or equal to 18.9 cubic meters (5,000 gallons) and less than 189.3 cubic meters (50,000 gallons) storing an organic liquid with an annual average true vapor pressure of the total Table 1 organic HAP in the stored organic liquid less than 27.6 kilopascals (4.0 psia). Since the annual average true vapor pressure of the total Table 1 organic HAP is less than 4.0 psia, these tanks are not required to be controlled under 40 C.F.R. 63, Subpart EEEE and are only subject to the notification, recordkeeping, and reporting requirements of 40 C.F.R. §§63.2343(b)(1) through (3). The unloading systems for these tanks, DJZ, DJY, and DJX are used for unloading the storage tanks when maintenance or inspection is required and are not an affected source under 40 C.F.R. 63, Subpart EEEE as specified in 40 C.F.R. §63.2338(c)(3). Since the tanks do not require control and the unloading systems are not affected sources, 40 C.F.R. §63.2350(c) does not require DuPont to develop a written startup, shutdown, and malfunction (SSM) plan for the tanks or unloading systems. Also, since the equipment leak detection requirements of 40 C.F.R. §63.2346(c) only apply if the affected source has at least one storage tank or transfer rack that meets the applicability criteria for control in Table 2 of 40 C.F.R. 63, Subpart EEEE, and none of the tanks or transfer racks are required to be controlled, DuPont is not subject to the leak detection and repair requirements of 40 C.F.R. 63, Subpart EEEE.

p. 40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM)

Part 3 of 14 is not subject for the following reasons:

40CFR§64.2(a)(3) – This Group did not add a pollutant-specific emissions unit that has potential, pre-control device emissions equal to or greater than 100 percent of the amount, in tons per year, of any pollutant that would require the emission unit to be classified as a major source.

**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: November 24, 2017

Ending Date: December 26, 2017

**Point of Contact**

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

Mike Egnor  
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. 1208 • Fax: 304/926-0478  
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**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)**

The Draft/Proposed Permit was issued under permit number R30-10700001-2017 (Part 3 of 14). Since the permit was not issued in 2017, the permit number has been changed to coincide with the year of issuance. The final permit was issued as R30-10700001-2018 (Part 3 of 14).