

# Fact Sheet



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

Permit Number: **R30-10700182-2019**  
Application Received: **February 28, 2018**  
Plant Identification Number: **03-54-10700182**  
Permittee: **The Chemours Company FC, LLC**  
Facility Name: **Washington Works**  
Business Unit: **Central Maintenance Services (Part 14 of 14)**  
Mailing Address: **Building 1, 8480 DuPont Road, Washington WV, 26181**

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Physical Location: Parkersburg, 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 towards Ohio. At the last exit prior to the bridge, exit from the Route 50 Bypass onto DuPont Road. At the light turn left on DuPont road. Approximately ½ mile from the turn you will see the site on your right and be approaching the exit from the road for the main gate to the facility.

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### **Facility Description**

Central Maintenance Services (CMS) performs operations such as welding, painting, insulation fabrication and installation, and vehicle refueling in support of specific maintenance requirements for other business units at the site. This group manages the Refrigerant systems and their maintenance as well as all specialized in-hours maintenance services that support the manufacturing units on-site.

## Emissions Summary

<b>Central Maintenance Services (Part 14 of 14) Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2017 Actual Emissions</b>
Carbon Monoxide (CO)	None	None
Nitrogen Oxides (NO <sub>x</sub> )	None	None
Particulate Matter (PM <sub>2.5</sub> )	< 0.01	< 0.01
Particulate Matter (PM <sub>10</sub> )	0.40	0.39
Total Particulate Matter (TSP)	0.48	0.47
Sulfur Dioxide (SO <sub>2</sub> )	None	None
Volatile Organic Compounds (VOC)	0.20	0.02
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2017 Actual Emissions</b>
Total HAPs	0.15	< 0.01

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

### 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's Central Maintenance Services (Part 14 of 14) 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.
	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	Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart JJ	National Emission Standards for Wood Furniture Manufacturing Operations
	40 C.F.R. Part 63 Subpart GGGGG	National Emission Standards for Hazardous Air Pollutants: Site Remediation
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR21, Section 30	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 (if any)
None		

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**

The following changes were made to the Permit during this renewal:

1. Chemours Washington Works has taken ownership of this Part 14 of 14. The Permittee name and number have been changed from "E. I. du Pont de Nemours and Company" and "10700001" to "The Chemours Company FC, LLC" and "10700182", respectively.
2. The contact information in Conditions 3.5.3, 3.5.5, and 3.5.6 has been updated.
3. The nonapplicability requirements have been revised in Condition 3.7.2.
4. The following Emission Units have been added and removed from the site:

Removed –

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
M5/1B15G6	M5/1B15G6E	Walter Grinder	1995	400 pph	Integral
M2/1B15L	M2/1B15LE	Metal Lathe	1950s	50 CFM	Oil Mist Filter
M1/1B15C1	M1/1B15C1E	Parts Cleaner	2012	34 gallons	None
M1/1B15C2	M1/1B15C2E	Parts Cleaner	2012	80 gallons	None

Added –

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
M16/1B15C1	M16/1B15C1E	Parts Cleaner	2017	80 gallons	None

As a result, the Section 1.0 Equipment Table has been revised accordingly.

5. The Walter Grinder (M5/1B15G6) and Metal Lathe (M2/1B15L) have been removed from the site. These units have been removed from Condition 4.1.3. Conditions 4.2.3, 4.2.4, 4.4.4, and 4.4.5 have been deleted. References to Conditions 4.2.3, 4.2.4, 4.4.4, and 4.4.5 have been removed from Conditions 4.5.1 and 4.5.2.
6. Section 5.0. Parts Cleaners (M1/1B15C1 and M1/1B15C2) have been removed from the site. Parts Cleaner M16/1B15C1 has been added. Parts Cleaner M16/1B15C1 has replaced M1/1B15C1 and M1/1B15C2 in Section 5.0.
7. Due to change of equipment, the Potential to Emit (PTE) has been revised in the Fact Sheet.
8. Updated the facilities mailing address.

### 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 constructed in Central Maintenance Services during 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 constructed in Central Maintenance Services during 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 Central Maintenance Services 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 Chemicals Manufacturing Industry.” Central Maintenance Services 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.” Central Maintenance Services 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. Central Maintenance Services 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 Central Maintenance Services.
- 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 does not apply to Central Maintenance Services 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 does not apply to Central Maintenance Services 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 does not apply to Central Maintenance Services 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 JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins. Central Maintenance Services does not produce the materials listed in 40 C.F.R. §63.1310.
- l. 40 C.F.R. 63, Subpart FFFF – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.” Central Maintenance Services does not manufacture any material or family of materials defined in §63.2435(b)(1)(i) through (v).
- m. 40 C.F.R. 63, Subpart WWWW “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Productions.” Central Maintenance Services 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.
- n. 40 C.F.R. 63, Subpart PPPP – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.” Central Maintenance Services

- does not produce an intermediate or final product that meets the definition of “surface coated” plastic part.
- o. 40 C.F.R. 63, Subpart IIII – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks.” Central Maintenance Services does not engage in the surface coating of new automobile or light-duty truck bodies or body parts for new automobiles or light-duty trucks.
  - p. 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 Central Maintenance Services subject to the requirements of this rule.
  - q. 40 C.F.R. 63, Subpart HHHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” Central Maintenance Services does not produce, blend, or manufacture coatings as part of the manufacturing process.
  - r. 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. Central Maintenance Services does not use, manufacture, nor distribute these materials.
  - s. 45CSR27 – “To Prevent and Control the Emission of Toxic Air Pollutants.” Central Maintenance Services does not have emission sources of toxic air pollutants as listed in 45CSR27.
  - t. 45CSR§21-19 – “Other Facilities that Emit Volatile Organic Compound (VOC).” The operations of Central Maintenance Services are outside of the SIC grouping to which this section of 45CSR21 applies.
  - u. 45CSR§21-40 – “Other Facilities that Emit Volatile Organic Compound (VOC).” None of the emission sources in Central Maintenance Services have maximum theoretical emissions of 6 pounds per hour or more and are not subject to the requirements of this section.
  - v. 40 C.F.R. Part 64 – “Compliance Assurance Monitoring”. The Central Maintenance Services Group does not have any pollutant specific emissions units (PSEU) at this facility that satisfy all of the applicability criteria requirements of 40 CFR § 64.2 (a), i.e., that: 1) have pre-control regulated pollutant potential emissions (PTE) equal to or greater than the “major” threshold limits to be classified as a major source; 2) are subject to an emission limitation or standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, Central Maintenance Services is not subject to the Compliance Assurance Monitoring (CAM) rule.

### **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 13, 2018  
Ending Date: January 14, 2019

**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  
michael.egnor@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.