

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on May 2, 2016.

Permit Number: **R30-10700182-2016**
Application Received: **June 4, 2018**
Plant Identification Number: **03-54-10700182**
Permittee: **The Chemours Company FC, LLC**
Facility Name: **Washington Works**
Business Unit: **Fluoropolymers (Part 2 of 14)**
Mailing Address: **P.O. Box 1217, Washington, WV 26181-1217**

Permit Action Number: MM02 Revised: January 18, 2019

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.

Facility Description

Within the Fluoropolymers Business Unit, there are the following Fluoroproduct production areas: C1, C2, C3, T1-T4 and T7, T5, and T6. Each area produces a product or family of products by varying operating conditions and small adjustments to raw material ratios or material feed rates.

Proposed Modification

The purpose of this action is to incorporate the requirements for an additional polymer blending/extrusion line for the C2 production area.

Emissions Summary

The change in potential emissions for this modification MM02 are given in the table below with other changes accounted for during this permit term.

Pollutant	2016 Renewal	AA01 ¹	MM01	MM02	Proposed
Carbon Monoxide	23.82	0	0	0	23.82
Nitrogen Oxides	38.88	0	0	0	38.88
Particulate Matter (PM _{2.5})	11.72	0	0	0	11.72
Particulate Matter (PM ₁₀)	18.37	-0.54	0	+0.15 ²	17.98
Total Particulate Matter (TSP)	18.37	-0.54	0	+0.15 ²	17.98
Sulfur Dioxide (SO ₂)	2.51	0	0	0	2.51
Volatile Organic Compounds (VOC)	239.38	0	0	+0.53	239.91
Methylene Chloride	33.95	0	0	0	33.95
Total HAPs	43.19	0	0	+0.32 ³	43.51

¹ The decreases for AA01 were determined from permit Table 4.1.1. in which the PM₁₀ limit for emission point C1FSE was changed from 0.56 tpy to 0.02 tpy.

² This increase is the sum of the annual limits for emission points C2KLE, C2KNE, C2EBE, and C2DHE added in condition 5.1.1.

³ This includes the 0.16 tpy HF increase in condition 5.1.3., and the 0.16 tpy increase in HAPs other than Hydrogen Fluoride in condition 5.1.4.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the 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. Therefore, Chemours 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	PM from Manufacturing Processes
	45CSR13	Construction/modification permits
	45CSR30	Operating permit requirement.
State Only:	N/A	

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

The active permits/consent orders associated with this minor modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-1953K	July 25, 2018	

Determinations and Justifications

Changes made to the Title V Permit as part of this minor modification are summarized below:

1. **45CSR13, Permit No. R13-1953K.** This Class I Administrative Update permit was approved for an additional polymer blending/extrusion line for the business unit. According to the memorandum accompanying this NSR permit, the proposed emissions from this additional line are in the form of PM₁₀ and PM_{2.5}; volatile organic compounds (VOCs); hydrogen fluoride (HF), which is classified as a hazardous air pollutant (HAP) and the only HAP emitted from this proposed line. The line will add four new emission points and utilize one existing control device and corresponding emission point. According to the same memorandum, the proposed line is a manufacturing process and only subject to the particulate matter (process weight rate) and visible emission standards of 45CSR7. HF is not defined as a mineral acid and therefore not subject to the mineral acid standards of 45CSR7. No other state rules or federal regulations are applicable to this proposed polymer blending/extrusion line. The table below describes the changes in the underlying permit and the corresponding change in the operating permit.

NSR	Title V	Discussion
1.0	1.1	<ul style="list-style-type: none"> • Under the C2 area, rows have been added for the additional emission units and emission points identified in the underlying permit. • The description of C2DH has been revised to reflect the underlying permit. • Emission unit C2DO has been added as a row. Since C2DO was already in Attachment C of Appendix B, the installation date has been written as 1998 since this is the date where C2EUC appears with the Elutriator C2EU.
4.1.1.	5.1.1.	<ul style="list-style-type: none"> • C2DO has been added to the row for emission point C2EUE. • Rows have been added for emission points C2KLE, C2KNE, C2EBE, and C2DHE. In the row for C2EBE the NSR permit lists source ID C2EBE2. This has been changed to C2EB2 to reflect the consistency of this nomenclature throughout the NSR permit Attachment B. • For the emission points added to the table, the PM emission limits under 45CSR§7-4.1. were calculated using the respective design capacities provided in the application. The emission points C2KLE, C2EBE, and C2DHE each have an NSR permit limit that is less than its 45CSR7 limitation calculated for a Type 'd' source in Table 45-7A of the rule. Therefore, these sources have been added to the streamlining note at the end of the permit condition. For the emission point

NSR	Title V	Discussion
		C2KNE compliance with the R13 permit limit does not ensure compliance with the 45CSR7 limit. The R13 limit is written based upon an NSR permitting practice of setting a limit of 0.01 lb/hr for pollutants with potential emissions less than 0.01 lb/hr. In this case, the potential emissions provided in the application are almost four orders of magnitude smaller than the 45CSR7 limit. Therefore, compliance with 45CSR7 should not be problematic for C2KNE. Due to claim of confidentiality, neither the design capacities nor the corresponding PM limits calculated using Table 45-7A have been mentioned in this streamlining discussion
4.1.2.	5.1.2.	Rows have been added for emission points C2DHE and C2EBE.
4.1.3.	5.1.3.	Rows have been added for emission points C2DHE and C2EBE.
4.1.4.	5.1.4.	Rows have been added for emission points C2DHE and C2EBE.
4.2.1.	5.2.1.	Rows have been added for control device IDs C2EB1C, C2EA1C, C2EA2C, C2KNC1, C2KNC2, and C2KLC.
4.2.2.	5.2.2.	C2EBE has been added to the third statement in the first paragraph. 45CSR§30-5.1.c. has been added to the citation of authority since the NSR permit requires Method 22 for a “sufficient time interval” but the Title V permit specifies 1 minute.
Attachment B	Appendix B: Attachments A, B, C, and D	<ul style="list-style-type: none"> • The alphabetic suffix of the underlying permit has been updated in the titles of Attachments A, B, C, and D. • In Attachment B rows have been added for emission points C2DHE, C2KLE, C2KNE, and C2EBE. Also, C2DO has been added to the row for emission point C2EUE. • In Attachment C, annual emissions of VOC, rows have been added for emission points C2DHE, C2KLE, C2KNE, and C2EBE. • In Attachment C, annual emissions of PM₁₀, rows have been added for emission points C2KUE, C2DHE, C2KLE, C2KNE, and C2EBE. • In Attachment C, annual emissions of HF, rows have been added for emission points C2DHE and C2EBE. • In Attachment C, annual emissions of Total HAPs, rows have been added for emission points C2DHE and C2EBE.

2. **45CSR7 – To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations.** The emission points C2KLE, C2KNE, C2EBE, and C2DHE permitted in R13-1953K have been added to the list of affected emission points subject to the opacity requirements in permit conditions 5.1.8.and 5.1.9.
3. **Facility-wide Reporting Requirements.** The “boilerplate” reporting conditions 3.5.3., 3.5.5., and 3.5.6. have been revised to include information for electronic submittal.

Non-Applicability Determinations

None.

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: Not applicable
Ending Date: Not applicable

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

Denton B. McDerment, PE
Title V Permit Engineer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
denton.b.mcderment@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.

Point of Contact

Denton B. McDerment, PE
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

No comments were received from U.S. EPA.