

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 December 24, 2013.

Permit Number: **R30-10700001-2013**
Application Received: **September 20, 2017**
Plant Identification Number: **107-00001**
Permittee: **E. I. du Pont de Nemours and Company**
Facility Name: **Washington Works**
Manufacturing Unit: **Development and Laboratory Services (Part 13 of 14)**
Mailing Address: **P. O. Box 1217, Washington, WV 26181-1217**

Permit Action Number: MM01 Revised: March 6, 2018

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 442.103 km Easting • 4,346.800 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

Central Laboratory Services (Part 13 of 14) is the result of consolidation of laboratory services involved with the final product qualification and testing, intermediate process sample analysis, and raw material qualification. The area also maintains a small facility for environmental testing, principally for water and for OSHA compliance monitoring.

Emissions Summary

The minor modification MM01 results in the removal of the A6, A8, and A10 extruders and associated equipment which have been shut down, dismantled, and removed. This removal was approved in R13-2330H. The change in emissions as a result of this modification are summarized below:

Pollutant	Decrease in lbs/hr	Decrease in TPY
PM	2.37	10.35
CO	0.09	0.40
SO ₂	0.01	0.01
VOC	0.83	3.61
Total HAPs	0.25	1.20

Title V Program Applicability Basis

With the proposed changes associated with this modification of the Development and Laboratory Services Permit, this facility as a whole 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 of aggregated 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.

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

Federal and State:	45CSR13	Permits for construction, modification, relocation, etc.
	45CSR30	Operating Permit Requirement
State Only:	N/A	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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>)
R13-2330H	9/22/2017	
R13-2617J	10/5/2017	

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 B, which may be downloaded from DAQ's website.

Determinations and Justifications

MM01

The Part 13 of 14 Title V Permit is for Development and Laboratory Sources. The minor modification MM01 results in the removal of the A6, A8, and A10 extruders and associated equipment which have been shut down, dismantled, and removed. This removal was approved in R13-2330H. The following changes have been made to the Permit:

The following equipment has been removed from the equipment table:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
22-E-001	22-C-001 Bag Filter	22-S-001	Area Hoods to Bag Filter	7,200 ACFM	1988
		22-S-A11-007	A10/A11 Surface Coater	3 PU ¹	2000
22-E-A11-007	22-C-A11-007 Cyclone	22-S-A11-007	A10/A11 Surface Coater	3 PU ¹	2000
22-E-A6-001	None	22-S-A6-001A	A6 Vent Ports	3 PU ¹	1988
		22-S-A6-001B	A6 Vacuum Pump	3 PU ¹	1988
22-E-A6-002	None	22-S-A6-002	A6 Die	3 PU ¹	1988
		22-S-A6-003	A6 Cutter	3 PU ¹	1988
		22-S-A6-004	A6 Cooler/Screenner	3 PU ¹	1988
		22-S-A6-005	Product Conveying	3 PU ¹	1988
		22-S-A6-006	Product Bin/Box	3 PU ¹	1988
		22-S-A6-007	A6 Vacuum Pump	3 PU ¹	1988
22-E-A8-001	None	22-S-A8-001A	A8 Vent Ports	1 PU ¹	1988
		22-S-A8-001B	A8 Vacuum Pump	1 PU ¹	1988
22-E-A8-002	None	22-S-A8-002	A8 Die	1 PU ¹	1988
		22-S-A8-003	A8 Cutter	1 PU ¹	1988
		22-S-A8-004	A8 Cooler/Screenner	1 PU ¹	1988
		22-S-A8-005	Product Conveying	1 PU ¹	1988
		22-S-A8-006	Product Bin/Box	1 PU ¹	1988
		22-S-A11-003	A11 Cutter	2 PU ¹	2000
		22-S-A11-004	A11 Cooler/Screenner	2 PU ¹	2000
		22-S-A11-005	Product Conveying	2 PU ¹	2000
		22-S-A11-006	Product Bin/Box	2 PU ¹	2000
		22-S-A11-007	A11 Vacuum Pump	2 PU ¹	2000
22-E-A10-001	None	22-S-A10-001A	A10 Vent Ports	3 PU ¹	2000
		22-S-A10-001B	A10 Vacuum Pump	3 PU ¹	2000

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
22-E-A10-002	None	22-S-A10-003	A10-Cutter	3 PU¹	2000
		22-S-A10-004	A10 Cooler/Screenner	3 PU ¹	2000
		22-S-A10-005	Product Conveying	3 PU¹	2000
		22-S-A10-006	Product Bin/Box	3 PU¹	2000
		22-S-A10-007	Box/Bin Sparge Station	3 PU¹	2000
22-E-A11-001	None	22-S-A11-001A	A11 Vent Ports	2 PU ¹	2000
		22-S-A11-001B	A11 Vacuum Pump	2 PU ¹	2000
22-E-A11-002	22-C-A10-002 Scrubber	22-S-A10-002	A10 Die	3 PU¹	2000
	22-C-A11-002 Scrubber	22-S-A11-002	A11 Die	2 PU ¹	2000
22-E-001	None	22-S-101	Development Laboratory Hood	2,830 ACFM	1970

Updated Section 1.2 to list the most current version of the NSR Permits.

Conditions 3.5.3, 3.5.5, and 3.5.6 have been updated to the most current version.

Updated the page numbers and removed Section 6.0 from the Table of Contents.

Removed references to R13-2330 from Conditions 3.1.13, 3.1.15, 3.1.16, 3.2.2, 3.4.7, 3.4.1, 3.4.8, 3.4.9, and 3.1.17.

Removed the entire Section 6 for Research and Development as this process and equipment no longer exist.

Removed Condition 5.2.1 and changed it to “Reserved”. This Condition required Rule 7 opacity monitoring requirements for the extrusion units (L046, L047, L048, and L050) in the Central Laboratory. These sources were incorrectly described as process sources when the Title V Permit (R30-10700001-2004) was issued in 2004 and when R13-2654 was issued in 2007 (These units were transferred to R13-2330F in 2014). These units are located in the laboratory area and only used to prepare test samples for chemical and physical testing or to conduct that testing. Because these devices are not process equipment that performs a manufacturing operation as defined in 45CSR7, the opacity monitoring and recordkeeping required by Condition 5.2.1 does not apply.

Corrected the UTM Coordinates.

Removed the following equipment from Appendix A, Attachment A.

Emission Point Identification	Source Identification	Source Description
22-E-A10-001	22-S-A10	Extruder vacuum
22-E-A11-001	22-S-A11	Extruder vacuum
22-S-A6-001	22-S-A6	Extruder vacuum
22-E-A11-002	22-S-A10/22-S-A11	Extruder die heads
22-S-A6-002	22-S-A6	Extruder die head
22-E-A10-002	22-S-A10/22-S-A11	Extruder cutters
22-S-A6-003	22-S-A6	Extruder cutter

Non-Applicability Determinations

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

N/A

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: N/A

Ending Date: N/A

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 57th 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)

On January 18, 2018 Chris Shoop from DuPont Washington Works identified that the following units were listed in the Title V Permit, but have been removed from service and no longer exist at the facility:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
22-S-A11-003	22-E-A8-002	A11 Cutter	2000	2 PU ¹	None
22-S-A11-004	22-E-A8-002	A11 Cooler/Screenner	2000	2 PU ¹	None
22-S-A11-005	22-E-A8-002	Product Conveying	2000	2 PU ¹	None
22-S-A11-006	22-E-A8-002	Product Bin/Box	2000	2 PU ¹	None
22-S-A11-001A	22-E-A11-001	A11 Vent Ports	2000	2 PU ¹	None
22-S-A11-001B	22-E-A11-001	A11 Vacuum Pump	2000	2 PU ¹	None
22-S-A11-002	22-E-A11-002	A11 Die	2000	2 PU ¹	22-C-A11-002 Scrubber
22-S-A10-004	22-E-A10-002	A10 Cooler/Screenner	2000	3 PU ¹	None

When R13-2330H was issued, it removed all applicable requirements for these units, but the emission units are still listed in the R13-2330H Permit. Since the equipment no longer exists at the facility, and there are no applicable requirements, the above units have been removed from the Title V Permit.