West Virginia Department of Environmental Protection
Division of Air Quality

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 01/09/2018.

Permit Number: **R30-10700001-2018**
Applications Received: **September 2, 2020 (MM07)**
Plant Identification Number: **10700001**
Permittee: **DuPont Specialty Products USA, LLC**
Facility Name: **Washington Works**
Business Unit: **Acetal Resin Production (Part 3 of 14)**
Mailing Address: **P.O. Box 2800, Washington, WV 26181-2800**

Permit Action Numbers: MM07 Revised: March 2, 2021

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

MM07: This modification is related to R13-2381L. This minor modification is to allow for installation/operation of D6 Sorter System controlled by existing bagfilter DQC-C/DQC-E and to connect #1 Ext. Fluff Bin to existing baghouse DTZ-C.

Emissions Summary

This modification results in the following emission changes:

Control Device ID	Emission Point ID	Pollutant	New Emission Rate (Lb/Hr)	New Emission Rate (TPY)	Change Lb/Hr	Change TPY
DTZ-C	DTZ-E	Methanol	0.02	0.04	0.01	0.0

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 pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs. 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, 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:	45CSR7	Particulate matter and opacity limits for manufacturing sources
	45CSR13	Construction permit requirement.
	45CSR30	Operating permit requirement.
State Only:	45CSR27	Toxic Air Pollutant limits for manufacturing sources

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 affected by this modification are as follows:

Permit or Consent Order Number	**Date of Issuance**	**Permit Determinations or Amendments That Affect the Permit *(if any)***
R13-2381L	October 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

MM07:
R13-2381L

- The Section 1.1 Emission Units Table has been updated as follows:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Control Device
DQH-S	DQC-E	#6 Ext. Fluff Bin	1960	DQC-C Bag Filter~~s~~
DQI-S	DQC-E	#3 Ext. Fluff Bin	1960	DQC-C Bag Filter~~s~~
DQJ-S	DQC-E	#4 Ext. Fluff Bin	1972	DQC-C Bag Filter~~s~~
DSS6-S	DQC-E	D6 Sorter System	2020	DQC-C Bag Filter
HFJ-S	~~HEQ-E~~DTZ-E	#1 Ext. Fluff Bin	1997	~~None~~DTZ-C Bag Filter

- Updated the Section 1.2 Permit Table to include R13-2381L.
- HEQ-E was removed from the list of affected emission units in conditions 6.1.3, 6.1.7, 6.1.8.
- Updated Appendix D as follows:

APPENDIX A of R13-2381
Bagfilter Performance and Compliance Monitoring

Control Device ID	Emission Point ID	Uncontrolled PM Emissions (lb/hr)	Control Efficiency (%)	Controlled PM Emissions (lb/hr)	Compliance Monitoring		
					Activity	Parameter and/or Limit	Frequency
DBFS1-C	DBFS1-E	1.50	98	0.03	Opacity	20%	Monthly
DBFS2-C	DBFS2-E	1.50	98	0.03	Opacity	20%	Monthly
DBFS3-C	DBFS3-E	1.50	98	0.03	Opacity	20%	Monthly
DBFS4-C	DBFS4-E	1.50	98	0.03	Opacity	20%	Monthly
DBFS5-C	DBFS5-E	1.50	98	0.03	Opacity	20%	Monthly
DBFS6-C	DBFS6-E	1.50	98	0.03	Opacity	20%	Monthly
DBFS7-C	DBFS7-E	1.50	98	0.03	Opacity	20%	Monthly
DBFS8-C	DBFS8-E	1.50	98	0.03	Opacity	20%	Monthly

Control Device ID	Emission Point ID	Uncontrolled PM Emissions (lb/hr)	Control Efficiency (%)	Controlled PM Emissions (lb/hr)	Compliance Monitoring		
					Activity	Parameter and/or Limit	Frequency
DCMUP-P	DCMUP-E	0.90	99	0.01	Opacity	20%	Monthly
DQC-C	DQC-E	~~0.81~~1.16	99.9	0.01	Opacity	20%	Monthly
DQE-P	DQE-E	0.04	99.9	0.01	Opacity	20%	Monthly
DRY-C	DRY-E	0.06	99.9	0.01	Opacity	20%	Monthly
DTZ-C	DTZ-E	~~0.45~~0.72	99.9	0.01	Opacity	20%	Monthly
DUK-C	DUK-E	0.02	99.9	0.01	Opacity	20%	Monthly
DUL-C	DUK-E	0.02	99.9	0.01	Opacity	20%	Monthly
DUQ-C	DUQ-E	2.47	99.9	0.01	Opacity	20%	Monthly
DUR-P	DUR-E	3.30	99.0	0.01	Opacity	20%	Monthly
DUST-P	DUST-E	0.01	99%	0.01	Opacity	20%	Monthly
DTZ-C	DTZ-E	0.02	99.95	0.01	Opacity	20%	Monthly
DVI-C	DVI-E	0.03	99.9	0.01	Opacity	20%	Monthly
DVJ-C	DVJ-E	0.03	99.9	0.01	Opacity	20%	Monthly
DZB-C	DZB-E	0.11	99.9	0.01	Opacity	20%	Monthly
HDW-C	HDW-E	0.01	99.9	0.01	Opacity	20%	Monthly
HEF-C	HEG-E	0.02	99.9	0.01	Opacity	20%	Monthly
HEO-C	HEO-E	0.01	99.9	0.01	Opacity	20%	Monthly
HER-C	DZG-E/ DZI-E	0.02	99.9	0.01	Opacity	20%	Monthly
HEW-P	DZG-E /DZI-E	0.01	99.9	0.01	Opacity	20%	Monthly
HFO-P	HFP-E	0.01	99.9	0.01	Opacity	20%	Monthly

APPENDIX B of R13-2381
Maximum Permitted Emission Rates

Emission Point	Control Device	Pollutant	Permitted Emissions	
			Hourly (lb/hr)	Annual (ton/yr)
DBFRCL1-E		PM_{10}	0.24	0.51
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DBFRCL2-E		PM_{10}	0.24	0.51
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DBFRCL3-E		PM_{10}	0.24	0.51
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DBFS1-E	DBFS1-C	PM_{10}	0.03	0.14
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DBFS2-E	DBFS2-C	PM_{10}	0.03	0.14
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DBFS3-E	DBFS3-C	PM10	0.03	0.14
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DBFS4-E	DBFS4-C	PM10	0.03	0.14
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DBFS5-E	DBFS5-C	PM_{10}	0.03	0.14
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DBFS6-E	DBFS6-C	PM_{10}	0.03	0.14
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DBFS7-E	DBFS7-C	PM_{10}	0.03	0.14
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01

Emission Point	Control Device	Pollutant	Permitted Emissions	
			Hourly (lb/hr)	Annual (ton/yr)
DBFS8-E	DBFS8-C	PM_{10}	0.03	0.14
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DCMUP-E	DCMUP-C	PM_{10}	0.01	0.01
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DLAB-E		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DPD-E		VOC	0.04	0.14
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
DQC-E	DQC-C	PM_{10}	0.01	0.01
		VOC	0.37	0.13
		Total HAP	0.21	0.08
		Formaldehyde	0.19	0.08
		Methanol	0.02	0.01
DQE-E	DQE-P	PM_{10}	0.01	0.01
		VOC	0.05	0.02
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DQM-E		PM_{10}	0.02	0.06
		VOC	0.02	0.05
		Total HAP	0.02	0.04
		Formaldehyde	0.02	0.04
		Methanol	0.01	0.01
DQN-E		PM_{10}	0.02	0.06
		VOC	0.04	0.12
		Total HAP	0.01	0.02
		Formaldehyde	0.01	0.02
		Methanol	0.01	0.01
DQR-E		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
DQV-E		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DRY-E	DRY-P	PM_{10}	0.01	0.01
		VOC	0.08	0.17
		Total HAP	0.06	0.15
		Formaldehyde	0.06	0.14
		Methanol	0.01	0.02

Emission Point	Control Device	Pollutant	Permitted Emissions	
			Hourly (lb/hr)	Annual (ton/yr)
DSN-E	DSN-P	PM_{10}	0.01	0.02
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DTH-E		PM_{10}	0.02	0.08
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DTI-E		PM_{10}	0.02	0.08
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DTJ-E		PM_{10}	0.02	0.08
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DTK-E		PM_{10}	0.02	0.08
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DTL-E		PM_{10}	0.02	0.08
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DTM-E		PM_{10}	0.02	0.08
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DTN-E		PM_{10}	0.02	0.08
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DTO-E		PM_{10}	0.02	0.08
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01

Emission Point	Control Device	Pollutant	Permitted Emissions	
			Hourly (lb/hr)	Annual (ton/yr)
DTZ-E	DTZ-C	PM_{10}	0.01	0.01
		VOC	0.18	0.59
		Total HAP	0.10	0.34
		Formaldehyde	0.09	0.30
		Methanol	~~0.01~~0.02	0.04
DUB-E		PM_{10}	0.08	0.01
		VOC	0.38	0.01
		Total HAP	0.17	0.01
		Formaldehyde	0.17	0.01
DUC-E		PM_{10}	0.08	0.01
		VOC	0.37	0.01
		Total HAP	0.17	0.01
DUD-E		PM_{10}	0.08	0.01
		VOC	0.38	0.01
		Total HAP	0.17	0.01
		Formaldehyde	0.17	0.01
DUK-E	DUK-C DUL-C	PM_{10}	0.01	0.01
		VOC	0.69	2.33
		Total HAP	0.47	1.57
		Formaldehyde	0.42	1.40
		Methanol	0.05	0.17
DUQ-E	DUQ-C	PM_{10}	0.01	0.02
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
DUR-E	DUR-C	PM_{10}	0.01	0.01
		VOC	0.03	0.02
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DUST-E	DUST-C	PM_{10}	0.01	0.01
		VOC	0.23	0.02
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01
DVI-E	DVI-C	PM_{10}	0.01	0.01
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
DVJ-E	DVJ-C	PM_{10}	0.01	0.01
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
DVN-E		PM_{10}	0.02	0.06
		VOC	0.04	0.12
		Total HAP	0.01	0.02
		Formaldehyde	0.01	0.02
		Methanol	0.01	0.01
DWA-E	DWA-P	PM_{10}	0.01	0.01
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
		Methanol	0.01	0.01

Emission Point	Control Device	Pollutant	Permitted Emissions	
			Hourly (lb/hr)	Annual (ton/yr)
DWK-E		PM_{10}	0.01	0.01
		VOC	0.02	0.09
		Total HAP	0.02	0.09
		Formaldehyde	0.02	0.09
DWU-E		PM_{10}	0.01	0.01
		VOC	0.04	0.15
		Total HAP	0.04	0.15
		Formaldehyde	0.04	0.14
		Methanol	0.01	0.01
DWV-E		PM_{10}	0.01	0.03
		VOC	0.04	0.15
		Total HAP	0.04	0.15
		Formaldehyde	0.03	0.14
		Methanol	0.01	0.01
DWW-E		PM_{10}	0.01	0.02
		VOC	0.02	0.10
		Total HAP	0.02	0.10
		Formaldehyde	0.02	0.07
		Methanol	0.01	0.03
DWX-E		PM_{10}	0.04	0.16
		VOC	0.03	0.10
		Total HAP	0.03	0.10
		Formaldehyde	0.02	0.10
		Methanol	0.01	0.01
DZB-E	DZB-C	PM_{10}	0.01	0.01
		VOC	0.41	1.04
		Total HAP	0.20	0.64
		Formaldehyde	0.17	0.57
		Methanol	0.03	0.07
DZD-E		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
DZG-E DZI-E	HEW-P HER-P	PM_{10}	0.01	0.01
HCA-E		PM_{10}	0.02	0.06
		VOC	0.04	0.12
		Total HAP	0.01	0.02
		Formaldehyde	0.01	0.02
		Methanol	0.01	0.01
HDW-E	HDW-C	PM_{10}	0.01	0.01
		VOC	0.01	0.01
		Total HAP	0.01	0.01
		Formaldehyde	0.01	0.01
HDY-E		PM_{10}	0.01	0.04
		VOC	0.11	0.37
		Total HAP	0.10	0.26
		Formaldehyde	0.08	0.25
		Methanol	0.01	0.01
HDZ-E		VOC	0.01	0.01

Emission Point	Control Device	Pollutant	Permitted Emissions	
			Hourly (lb/hr)	Annual (ton/yr)
HEE-E	HEE-P	PM_{10} VOC Total HAP Formaldehyde Methanol	0.08 0.33 0.06 0.05 0.01	0.27 1.11 0.15 0.14 0.01
HEG-E	HEF-C	PM_{10} VOC Total HAP Formaldehyde Methanol	0.01 0.14 0.06 0.06 0.01	0.01 0.58 0.27 0.25 0.02
HEO-E	HEO-C	PM_{10} VOC Total HAP Formaldehyde	0.01 0.10 0.08 0.06	0.01 0.41 0.32 0.25
~~HEQ-E~~	~~None~~	~~PM_{10}~~ ~~VOC~~ ~~Total HAP~~ ~~Formaldehyde~~ ~~Methanol~~	~~0.27~~ ~~0.01~~ ~~0.01~~ ~~0.01~~ ~~0.01~~	~~0.08~~ ~~0.01~~ ~~0.01~~ ~~0.01~~ ~~0.01~~
HFP-E	HFO-P	PM_{10}	0.01	0.01
HFV-E	None	VOC Total HAP Formaldehyde	0.01 0.01 0.01	0.01 0.01 0.01
HGW-E	None	PM_{10} VOC Total HAP Formaldehyde	0.01 0.01 0.01 0.01	0.01 0.06 0.05 0.05
HHA-E		PM_{10} VOC Total HAP Formaldehyde Methanol	0.01 0.04 0.03 0.02 0.01	0.01 0.02 0.01 0.01 0.01
HHK-E	HHK-C	PM10 VOC Total HAP Formaldehyde Methanol	0.01 0.03 0.02 0.02 0.01	0.01 0.02 0.02 0.02 0.01

- The maximum of 45 days between consecutive readings for opacity checks has been removed from Condition 6.2.2 to provide consistency throughout the facility.

Non-Applicability Determinations

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

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: N/A
Ending Date: N/A

Point of Contact

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

Jonathan Carney
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41247
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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)

No comments received