

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 February 22, 2021.

Permit Number: **R30-10700001-2021 (8 of 14)**
Application Received: **June 25, 2021 (MM01) and July 6, 2021 (MM02)**
Plant Identification Number: **03-54-10700001**
Permittee: **DuPont Specialty Products USA, LLC**
Facility Name: **Washington Works**
Mailing Address: **P.O. Box 2800, Washington, WV 26181-2800**

Permit Action Number: *MM01 and MM02* Revised: *March 1, 2022*

Physical Location:	Washington, Wood County, West Virginia
UTM Coordinates:	422.27 km Easting • 4,346.57 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

DuPont Specialty Products USA, LLC - Washington Works (DuPont) is a multiple business, multiple product line facility that produces plastic resins and their associated feedstock materials. DuPont divided the initial Title V Permit Application into fourteen separate business units, each of which received a Title V Permit. This permit is Group 8 of 14, Specialty Compounding Division, which is a segment of DuPont that produces polymer blends and mixtures through the use of mixing and extrusion facilities. Specialty Compounding Division takes raw materials, generally in a pellet or powder form, and mixes them together to create high performance plastic blends and polymers for use in automotive, aerospace, and other commercial manufacturing efforts located off-site.

In 2015 several business units of the facility were sold to The Chemours Company FC, LLC (10700182). The Specialty Compounding Division (8 of 14) is still owned by DuPont.

Emissions Summary

The changes in potential emissions associated with the minor modifications (MM01 and MM02) are as follows:

Change in Potential Emissions	
Pollutant	Change in Potential Emissions (+ or -), TPY
PM	+6.05
PM ₁₀	+1.14
PM _{2.5}	+0.93
VOC's	+1.80
CO	+0.59
Total HAPs	+1.62
HAP (Formaldehyde)	+1.59
HAP (Benzene)	+0.01
HAP (Acetaldehyde)	+0.01
HAP (Acrylonitrile)	+0.02

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 TPY of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 TPY of aggregate HAPs, DuPont Specialty Products USA, LLC's 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 45CSR30 45CSR7	Minor NSR Permits Operating permit requirement. Prevent and control PM air pollution from manufacturing processes and associated operations.
State Only:	45CSR27	Prevent and control the emissions of toxic air pollutants

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 (<i>if any</i>)
R13-1533O	October 15, 2021	
R13-2617N	October 15, 2021	

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

R13-1533O Changes – MM01

This modification increased the emissions due to increased production, start up of a new extrusion line SE, and voluntary inclusion of emissions from extrusion line SF for which it was previously determined that no permit was needed.

The following emission units were affected:

Emissions Units	Applicable Rule
S293-S-02A-F	45CSR7
S293-S-03A-F	45CSR7
S293-S-04A-F	45CSR7
S293-S-06A-F	45CSR7
S293-S-07A-F	45CSR7
S293-S-10A-F	45CSR7
S293-S-14A-F	45CSR7

For the above emission units, Table 4.1.1 of Section 4.1.1. was changed. The emission limits in Table 4.1.1. were increased for the A-D emission units and new limits were included in Table 4.1.1. for the E and F emission units.

For condition 4.1.3., added that emissions from S293-S-03E and S293-S-03F are required to be routed through S293-C-04E and S293-C-04F respectively.

For condition 4.1.4., added that emissions from S293-S-02E (die) and S293-S-02F (die) are required to be routed through S293-C-03E and S293-C-03F respectively.

For condition 4.1.5., S293-E-02E, S293-E-03E, S293-E-04E, S293-E-05E, S293-E-06E were added to the list of emission units limited to 20 percent opacity.

For condition 4.1.6. S293-E-02E, S293-E-03E, S293-E-04E, S293-E-05E, S293-E-06E were added to the list of emission units to which the 40 percent opacity exception applies.

For condition 4.1.11., control devices S293-C-078 (removed and emissions from S293-S-078 routed to S293-C-031), S293-C-03F and S293-C-04F were deleted. These controls are no longer part of the exception now that they are listed in Section 1.0 Emission Units table of the New Source Review permit, R13-1533O.

For condition 4.1.12., S293-E-02F, S293-E-03F, S293-E-04F, S293-E-05F, and S293-E-06F and their corresponding Emission Units and Emission Limits were removed from the table. These Emission Points now have R13 emission limits that are included in condition 4.1.1. and have been streamlined with the less stringent 45CSR§7-4.1. limits which warrants the removal of these emission points from the table in this condition 4.1.12.

For condition 4.1.14., S293-C-03E and S293-C-03F were added to the list of wet scrubbers subject to the minimum liquor flow rate to the scrubbers limit of 12 gal/min.

For condition 4.2.1. S293-E-02E, S293-E-02F, S293-E-03E, S293-E-03F, S293-E-04E, S293-E-04F, S293-E-05E, S293-E-05F, S293-E-06A, S293-E-06B, S293-E-06C, S293-E-06D, S293-E-06E, and S293-E-06F were added to the list of emission units that are subject to monthly visible emission checks.

For condition 4.2.2., S293-C-03E and S293-C-03F were added to the list of wet scrubbers for which the liquor flow rate must be continuously monitored.

Appendix A –S293-E-02E, S293-E-03E, S293-E-04E, S293-E-05E, S293-E-02F, S293-E-03F, S293-E-04F, S293-E-05F were added to Attachment A for opacity monitoring.

Extruder SE and Extruder SF were added to Attachment B production records.

S293-E-02E, S293-E-03E, S293-E-04E, S293-E-05E, S293-E-02F, S293-E-03F, S293-E-04F, S293-E-05F were added to Attachment C and Attachment D for each applicable piece of equipment added for Extruder SE and Extruder SF.

With Methanol being added as one of the possible HAPs listed in the footnote to the Emission Limit table 4.1.1., Methanol emissions recordkeeping was added to Attachment D.

Miscellaneous

For condition 4.1.14. and 4.2.2., the minimum pressure drop across the venturi throat limit and continuous monitoring of venturi pressure drop were deleted because the permittee performs VE checks of the scrubbers on a regular basis and monitors scrubber liquor flow rate to ensure compliance with the emission limits.

R13-2617N Changes – MM02

Appendix B – Attachment A was updated to address the changes in R13-1533O.

Non-Applicability Determinations

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

40 C.F.R. 60 Subpart VVa – “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry.” The Specialty Compounding Division does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489a.

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 for minor modifications.
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
304/926-0499 ext. 41247
Jonathan.W.Carney@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.