

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 September 10, 2020.

Permit Number: **R30-10700208-2020 (6 of 14)**
Application Received: **June 29, 2024**
Plant Identification Number: **03-54-107-00208**
Permittee: **Celanese Polymer Products, LLC**
Facility Name: **Washington Works**
Business Unit: **Engineering Polymers (EPC) - East**
Mailing Address: **P.O. Box 2600 Washington, WV 26181-2600**

Permit Action Number: *MM03* Revised: *March 21, 2025*

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 442.368 km Easting • 4,346.679 km Northing • Zone 17
Directions: From I-77, take Exit 176 to U.S. Route 50W towards Athens, Ohio. At
the last exit prior to the bridge, exit from Route 50 Bypass onto DuPont
Road (Route 892). At the light, turn left onto DuPont Road.
Approximately one mile from the turn, the facility is on the right.

Facility Description

In the EPC - East Production Area (Part 6 of 14), polymer resins and other ingredients (such as plasticizers, fillers, reinforcing agents, anti-oxidants, flame-retardants, and colorants) are melt compounded through an extrusion/cutting operation into a final pelletized product.

This minor modification (MM03) for R30-10700208-2020 (6 of 14) includes the changes from R13-3574A. This permit revision was requested to clarify that Celanese is not a major source of hazardous air pollutants (HAPs) and has potential-to-emit of less than 14 tons per year (less than 1 ton per year actuals) of aggregate HAPs and less than 7 tons per year (0.05 tons per year actuals) of formaldehyde.

Emissions Summary

No changes in net potential emissions are expected to occur due to this revision.

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. Therefore, Celanese Polymer Products, LLC 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	NSR Permit Requirements.
	45CSR30	Operating Permit Requirements.
State Only:	None	

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>)
R13-3574A	August 14, 2024	

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 have been made to the Title V operating permit:

- Per company's request, permittee name and address were updated in the permit.
- The table in Section 1.2 was updated.
- Condition 3.4.4, the requirements of the Site Remediation MACT, 40 CFR 63 Subpart GGGGG, were removed from this permit per company's request.

- Condition 3.7.2 was updated.
- Condition 3.1.11 was added as “The permittee shall maintain total Hazardous Air Pollutant (HAP) emissions below 25 tons per year combined or 10 tons per year of any single HAP”.
- Condition 3.4.5 was added requiring annual site-wide HAP emissions records on a 12 month rolling total basis in accordance with the new condition 3.1.11.

Title V Boilerplate changes:

- **Conditions 3.1.6. and 3.3.1.** – The citation was revised to refer to the current version of the WV Code.
- **Condition 3.3.1.b** - The following sentence was added to the end of 3.3.1.b: “If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit shall be revised in accordance with 45CSR§30-6.4 or 45CSR§30-6.5 as applicable.”

Non-Applicability Determinations

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

Not applicable.

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.

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41283
Beena.j.modi@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)

- During the comment period, on February 27, 2025, per Company's request through email, the mailing address was updated in the permit.