

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10700208-2025**
Application Received: **July 22, 2024**
Plant Identification Number: **03-54-107-00208**
Permittee: **Celanese Polymer Products, LLC**
Business Unit: **Filaments Production (9 of 14)**
Facility Name: **Washington Works**
Mailing Address: **P.O. Box 2600, Washington, WV 26181-2600**

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 442.368 km Easting • 4346.679 km Northing • Zone 17
Directions: From I-77, take exit 176 to US 50W towards Athens, Ohio. Proceed west until exit for DuPont Rd (Rt-892). Then turn left (south) onto DuPont Rd, Rt-892. Proceed approximately 1 mile to the facility on the right.

Facility Description

In the Filaments Production Unit (Part 9 of 14), various thermoplastic resins are melted and extruded to form monofilament and layered resin strand for use as thread or bristle. Resin pellets, consisting of any number of resins, are first blended in feed hoppers and/or tote bins to produce a homogeneous feed material. The bin or hopper is then directly placed upon any one of 19 extruders and the material fed directly from the bin to the extruder. The extruder melt-blends the polymers and extrudes the polymer into a long strand. After extrusion the strands are fed to a draw machine (which stretches and decreases the diameter of the strand). Finishing materials and surface additives are placed on the strand and it is fed to a conditioning unit to set the final properties of the strand. The final strand is either wound onto spools, packaged as "hanks" of fiber, or formed into bundles for shipment to off-site customers.

Emissions Summary

Filaments Production (9 of 14) Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2023 Actual Emissions
Carbon Monoxide (CO)	0.81	0.43
Nitrogen Oxides (NO _x)	0.11	0.01
Particulate Matter (PM _{2.5})	0.28	0.01
Particulate Matter (PM ₁₀)	2.58	0.02
Total Particulate Matter (TSP)	12.9	0.20
Sulfur Dioxide (SO ₂)	0.01	0.01
Volatile Organic Compounds (VOC)	6.25	1.51

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2023 Emissions
Total HAPs	2.11	0.01

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit over 100 tons per year of criteria pollutants. Due to the facility-wide potential to emit over 100 tons per year of criteria pollutants, Celanese Polymer Products, LLC’s Washington Works Facility 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR11	Standby plans for emergency episodes.
	WV Code § 22-5-4 (a) (15)	The Secretary can request any pertinent information such as annual emission inventory reporting.
Federal and State:	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR§21-30	Control of VOC emissions from Solvent Metal Cleaning.

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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
None		

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 as part of this renewal:

- Ownership of the facility was transferred to Celanese Polymer Products, LLC.
- **Sections 2.0 and 3.0 – The Title V Boilerplate**
 - The Title V boilerplate was updated for conditions 2.1.3, 2.11.4, 2.17, 2.22.1, 3.1.6, 3.3.1, 3.3.1.b, 3.5.3, 3.5.4, 3.5.7, 3.5.8.a.1, and 3.5.8.a.2.
 - Condition 3.1.12 has been removed because 45CSR7-9.1 has been deleted from 45CSR7.
- **Section 4.0**
 - Condition 4.1.3 has been removed from the permit due to the deletion of 45CSR7 Section 10.3.

As a result of this change, F44 and F45 were determined to be subject to the fugitive emission requirements in 45CSR7-5.1 included in the Title V permit as condition 3.1.9. The South Melt Grid Burnout (F44) and North Melt Grid Burnout (F45) do not meet the definition of a source operation or source operation type in 45CSR7. These burnout units use heat to remove material left in the lines when switching to different colors. Some of the material turns to ash and some vents to the indoor vent hoods F44 and F45. Since this process is indoors, it is a fugitive source of emissions but since it can vent to a vent hood which exits to the roof of the building, condition 4.2.4 remains which requires the Permittee to conduct monthly visual inspections of the roof area and take steps to address if accumulation of filaments is present. Condition 4.4.4 requires the Permittee to maintain records of the monthly visual inspections of the roof area and note if any steps were needed to address if accumulation of filaments is present.

- **Section 5.0**

- The 45CSR21 citations have been updated for conditions 5.1.1 and 5.3.1.
- The cross reference in condition 5.4.1 was corrected from “5.2.1” to “5.3.1.”

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: March 28, 2025

Ending Date: April 28, 2025

Point of Contact

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

Nikki B. Moats
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/414-1282
Nikki.b.moats@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.