

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**
Application Received: **June 17, 2019**
Plant Identification Number: **10700001**
Permittee: **DuPont Specialty Products USA, LLC**
Facility Name: **Washington Works**
Manufacturing Unit: **Acetal Resin Production (Part 3 of 14)**
Mailing Address: **P.O. Box 2800, Washington, WV 26181-2800**

Permit Action Number: MM03 Revised: *November 13, 2019*

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

This modification is for the installation of two new bulk fluff silos (DBFS7-S and DBFS8-S) adjacent to the already existing silos. Each silo will be equipped with fabric filter control devices as per the already existing silos.

Emissions Summary

This modification results in the following emission changes:

Pollutant	Emissions (TPY)
PM ₁₀	0.28
Volatile Organic Compounds	0.02
Total HAPs	0.02
Formaldehyde	0.02
Methanol	0.02

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 (<i>if any</i>)
R13-2381J	07/19/2019	
R13-2617K	08/05/2019	

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

Changes were made to ensure that the updates contained within R13-2381J and R13-2617K were reflected within the Emission Units Table and Appendices A.1, D.1, and D.2. Table 1.2 was also updated with R13-2381J as it supersedes and replaces R13-2381I, and with R13-2617K as it supersedes and replaces R13-2617J.

The modifications required to add the two new bulk storage silos to the acetal resin production permit are as follows:

- Emission points DBFS7-E and DBFS8-E were added to the lists in sections 1.1, 6.1.3, 6.1.7, 6.1.8, 6.2.1a., 6.2.2., Appendix A.1, Appendix D.1, and Appendix D.2.
- Under 45 C.S.R. 7, the new bulk fluff silos are subject to opacity limits of twenty (20) percent, or 40 percent for an aggregate time of less than 5 minutes in any 60-minute period. Monthly monitoring is to be done by personnel trained in the practices and limitation of 40 C.F.R. 60, Appendix A, Method 22.
- These two silos are also subject to a 45 C.S.R. 7 section 4.1 hourly particulate matter emission limit of less than 3 lb/hr. The limit within appendix D.2 of 0.6 lb/hr for both silos is more stringent than this and demonstrates compliance with 45 C.S.R. 7 section 4.1.
- Since the two new bulk storage silos emit toxic air pollutants (TAPs), both are subject to 45 C.S.R. 27. R13-2617K was issued in order to add them to the table in Appendix A.1.

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:

Nikki Moats
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478
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