

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 August 29, 2014.

Permit Number: **R30-10700001-2014**
Application Received: **May 18, 2018**
Plant Identification Number: **03-54-107-00001**
Permittee: **E. I. du Pont de Nemours and Company**
Business Unit: **Filaments Production (9 of 14)**
Facility Name: **Washington Works**
Mailing Address: **P.O. Box 1217, Washington, WV 26181-1217**

Permit Action Number: *MM01* Revised: *September 7, 2018*

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 442.368 km Easting • 4346.679 km Northing • Zone 17
Directions: From I77 take exit 176. Take Route 50 west towards downtown Parkersburg. Stay on route 50 approximately 8.8 miles. Take the Dupont Road exit and turn left onto DuPont Road (Rte. 892). Plant main entrance is approximately 1.25 miles 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.

This minor modification is to remove Abrasive Blast Table 152F-006-00 and #19 Spinner 152F-016-19 from the permit.

Emissions Summary

With this modification, the potential emissions will decrease for PM/PM₁₀, CO and VOC by 0.277 tpy, 0.004 tpy and 0.241 tpy respectively.

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, 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:	45CSR30	Operating permit requirement.
State Only:	N/A	

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	N/A	

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

This permit modification removes Abrasive Blast Table 152F-006-00 and #19 Spinner 152F-016-19 from the permit. The Abrasive Blast Table has been rerouted to vent inside the building. This equipment is not

used for production purposes but rather for maintenance and upkeep activities and will be classified as an insignificant activity. The #19 Spinner has been shut down and all associated equipment has been removed. Modifications to the Title V permit include the following:

- 1) The “Emission Units” table was updated to remove the Abrasive Blast Table and #19 Spinner.
- 2) **Conditions 3.5.3., 3.5.5. and 3.5.6.** - These conditions were revised to incorporate Title V boilerplate changes that require electronic submittal of the Title V compliance certifications (annual and semi-annual), self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols to the WV DAQ.
- 3) **Condition 4.1.1.** – Removed F06 and F16.
- 4) **Condition 4.1.2.** – Removed F16.
- 5) **Condition 4.1.3.** – Removed F06.
- 6) **Condition 4.2.1.** – Removed F16.
- 7) **Condition 4.2.3.** – Replaced the requirement with “Reserved.”

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: Not Applicable for minor modifications.
Ending Date: N/A

Point of Contact

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

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478
frederick.tipane@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.