

Fact Sheet



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

Permit Number: **R30-10700208-2024 (13 of 14)**
Application Received: **November 14, 2023**
Plant Identification Number: **03-54-107-00208**
Permittee: **Celanese Polymer Products, LLC**
Facility Name: **Celanese Washington Works**
Business Unit: **Development and Laboratory Services**
Mailing Address: **P.O. Box 2600 Washington, WV 26181-2600**

Physical Location:	Washington, Wood County, West Virginia
UTM Coordinates:	442.103 km Easting • 4,346.800 km Northing • Zone 17
Directions:	From I-77 take the Route 50 By-pass around Parkersburg towards Ohio. At the last exit in West Virginia (DuPont Road) exit the divided highway. At the stop light turn left onto DuPont Road. Continue down DuPont Road approximately ½ mile. The plant will be visible on the right side of the road. Enter at the main gate.

Facility Description

Development and Laboratory Services (Part 13 of 14) is the result of consolidation of laboratory services involved with the final product qualification and testing, intermediate process sample analysis, and raw material qualification. The area also maintains a small facility for environmental testing, principally for water and for OSHA compliance monitoring.

Emissions Summary

Development and Laboratory Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2023 Actual Emissions
Carbon Monoxide (CO)	0.07	< 0.01
Nitrogen Oxides (NO _x)	0.01	< 0.01
Particulate Matter (PM _{2.5})	0.98	0.02
Particulate Matter (PM ₁₀)	0.98	0.02
Total Particulate Matter (TSP)	0.98	0.02
Volatile Organic Compounds (VOC)	0.54	0.01

Hazardous Air Pollutants	Potential Emissions	
Total HAPs	0.17	< 0.01

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

Title V Program Applicability Basis

Due to the facility-wide potential to emit over 100 tons per year of criteria pollutants, 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.

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.
	45CSR13	Permits for construction, modification, relocation, etc.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61 40 C.F.R. Part 82, Subpart F	Asbestos inspection and removal Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR27	Best Available Technology (BAT) for HAPs

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>)
R13-3574A	August 14, 2024	
R13-2330H	September 22, 2017	

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

- ❖ There have been no equipment changes at this facility since the issuance of R30-10700208-2019.
- ❖ On June 29, 2024, the company submitted a Class I Administrative Update for the Site-Wide Permit R13-3574. This administrative update was to summarize that Celanese - Washington Works is no longer a major source of hazardous air pollutants (HAPs). Celanese provided information that the facility's HAP potential-to-emit is 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. The company requested the inclusion of HAP emission limits that demonstrate that the facility is a true minor source for HAPs. Therefore, conditions 3.1.18 and 3.4.10 were added to this permit.

Non-Applicability Determinations

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

- a. 40 C.F.R. 60, Subpart K - "Standards of Performance For Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978." There are no storage tanks in Development and Laboratory Services.
- b. 40 C.F.R. 60, Subpart Ka - "Standards of Performance for Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984." There are no storage tanks in Development and Laboratory Services.
- c. 40 C.F.R. 60, Subpart Kb - "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984." There are no storage tanks in Development and Laboratory Services.

- d. 40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.” Development and Laboratory Services does not produce as intermediates or final products any of the materials listed in §60.489.
- e. 40 C.F.R. 60, Subpart DDD - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.” Development and Laboratory Services does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
- f. 40 C.F.R. 60, Subpart RRR - “Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.” Development and Laboratory Services does not produce any of the chemicals listed in §60.707 as a product, co-product, by-product, or intermediate.
- g. 40 C.F.R. 61, Subpart V - “National Emission Standards for Equipment Leaks (Fugitive Emissions Sources).” Applies to sources in VHAP service as defined in §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in Development and Laboratory Services.
- h. 40 C.F.R. 63, Subpart H - “National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.” 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in §§63.100(b)(1), (b)(2), and (b)(3).
- i. 40 C.F.R. 63, Subpart T - “National Emission Standards for Halogenated Solvent Cleaning.” There are no solvent cleaning units in Development and Laboratory Services using halogenated solvents as listed in §63.460(a).
- j. 40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.” Development and Laboratory Services does not produce the materials listed in §63.1310.
- k. 40 C.F.R. 63, Subpart EEEE – “National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).” Development and Laboratory Services does not engage in the activities to distribute organic liquids.
- l. 40 C.F.R.63, Subpart FFFF – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.” Development and Laboratory Services does not manufacture any material or family of materials defined in §63.2435(b)(1)(i) through (v).
- m. 40 C.F.R. 63, Subpart MMMM - “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.” There are no surface coating activities conducted in Development and Laboratory Services subject to the requirements of this rule.
- n. 40 C.F.R. 63, Subpart QQQQ - “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products.” The surface coating activities of Development and Laboratory Services are excluded from the requirements of the rule because they are non-commercial operations using coatings supplied by non-refillable aerosol containers.
- o. 40 C.F.R. 63, Subpart RRRR - “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.” The surface coating activities of Development and Laboratory Services use non-refillable aerosol containers for the purpose of repairing furniture for on-site use and are excluded from the requirements of the rule.

- p. 40 C.F.R. 63, Subpart GGGGG – “National Emission Standards for Hazardous Air Pollutants: Site Remediation.” Development and Laboratory does not conduct site remediations as defined in §63.7957.
- q. 40 C.F.R. 63, Subpart HHHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” Development and Laboratory Services does not manufacture coatings as defined in §63.8105.
- r. 40 C.F.R. 63, Subpart NNNNN – “National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production.” Development and Laboratory Services does not produce a liquid HCl product.
- s. 40 C.F.R. 82, Subpart B - “Protection of Stratospheric Ozone.” Requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing equipment need to be licensed. Development and Laboratory Services does not conduct motor vehicle maintenance involving CFCs on site.
- t. 40 C.F.R. 63, Subpart DD – “National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations.” The Development and Laboratory Services Area does not receive off-site materials as specified in paragraph 40 C.F.R §63.680(b) and the operations are not one of the waste management operations or recovery operations as specified in 40 C.F.R. §§63.680(a)(2)(vi).
- u. 40 C.F.R. 63, Subpart WWW – “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” The Development and Laboratory Services Area does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.
- v. 40 C.F.R. 63, Subpart DDDDD – “National Emission Standards for Hazardous Air Pollutants: Industrial/Commercial/Institutional Boilers and Process Heaters.” The Development and Laboratory Services Area does not own or operate an industrial, commercial, or institutional boiler or process heater as defined in 40 C.F.R. §63.7575.
- w. 45CSR2 – “To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.” The Development and Laboratory Services Area does not contain any fuel burning units.
- x. 45CSR10 – “To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.” The Development and Laboratory Services Area does not have any emission sources of sulfur oxides subject to this rule.
- y. 45CSR16 – “Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60.” The Development and Laboratory Services is not subject to any requirements under 40 C.F.R. 60.
- z. 45CSR17 – “To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.” Per 45CSR§17-6.1, the Development and Laboratory Services Area is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.
- aa. 45CSR34 – “Emission Standards for Hazardous Air Pollutants.” Development and Laboratory Services Area is not subject to any requirements under 40 C.F.R. 61 or 40 C.F.R. 63.
- ab. 40 CFR Part 64 – The facility did not have any pollutant specific emissions units (PSEUs) that satisfied all of the applicability criteria requirements of 40 CFR §64.2(a). There have been no emission units added to this permit since the previous renewal was issued, so CAM remains not applicable to any emission unit listed in the renewal application.

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: September 6, 2024

Ending Date: October 7, 2024

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 57 th 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)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.