

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10700182-2022**  
Application Received: **December 01, 2021**  
Plant Identification Number: **03-054-10700182**  
Permittee: **The Chemours Company FC, LLC**  
Facility Name: **Washington Works**  
Business Unit: **Power and Service Support (Part 10 of 14)**  
Mailing Address: **P.O. Box 1217, Washington, WV 26181-1217**

*Revised: N/A*

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Physical Location: Washington, Wood County, West Virginia  
UTM Coordinates: 422.27 km Easting • 4,346.57 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.

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### Facility Description

Power and Services manages and operates the plant infrastructure to support the operating business units. As part of these operations, Power and Services operates gas boilers to produce steam for on-site use. Power and Services personnel also operate an industrial wastewater treatment facility, a sanitary wastewater treatment facility, an air compressor system to supply plant air, and a water treatment facility to supply treated water for both process uses and sanitary uses on-site.

## Emissions Summary

<b>Power and Service Support Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2021 Actual Emissions<sup>1</sup></b>
Carbon Monoxide (CO)	359.3	105.28
Nitrogen Oxides (NO <sub>x</sub> )	284	332.26
Particulate Matter (PM <sub>2.5</sub> )	0.15	1.54
Particulate Matter (PM <sub>10</sub> )	7.65	6.63
Total Particulate Matter (TSP)	20.22	13.32
Sulfur Dioxide (SO <sub>2</sub> )	11.53	375.71
Volatile Organic Compounds (VOC)	699.58	184.26
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2021 Actual Emissions<sup>1</sup></b>
Benzene	0.04	0.02
Ethylbenzene	<0.01	<0.01
Formaldehyde	25.03	0.95
Methanol	7.5	6.28
Methylene Chloride	<0.01	<0.01
n-Hexane	7.02	2.09
Toluene	15.2	11.91
Xylene	0.01	<0.01
Other HAPs	7.04	5.79
Aggregate HAPs	61.87	27.04

<sup>1</sup> – The pollutants where the actual emissions are higher than the potential emissions are due to the boilers, Sorbent silos, and Coal Handling facilities being removed in 2021.

### Title V Program Applicability Basis

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, The Chemours Company FC, 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: 45CSR2 Opacity and PM limits for fuel burning units

	45CSR6	Open burning prohibited.
	45CSR7	PM and Opacity limits for manufacturing sources
	45CSR10	Control of emissions of sulfur oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits to construct/modify
	45CSR16	Standards of performance for new stationary sources pursuant to 40 CFR Part 60
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40 C.F.R. 60, Subpart Db	NSPS for Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
	40 C.F.R. 60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63, Subpart ZZZZ	RICE MACT
	40 C.F.R. 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR21, Section 30	Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds: Solvent Metal Cleaning
	45CSR27	To Prevent and Control the Emissions of Toxic Air Pollutants

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> )
R14 - 0014	01/02/2002	
R13-3223	12/8/2014	

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2654F	01/25/2022	
R13-3416	11/27/2018	

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 is the third renewal for this facility and the following changes have been made to the Title V permit.

- Section 1.0
  - Emission Units 475, 476, 477, 490, 491, 492, and 493 were removed from the Emission Units Table because the equipment has been decommissioned, disconnected, and is not in use.
  - Table 1.2 has been updated with the latest R13/R14 permit numbering.
- Section 3.0
  - The Title V Boilerplate was updated.
  - Conditions 3.7.2.a and 3.7.2.b were removed because they referenced boilers that have been decommissioned, disconnected, and are not in use.
  - Former Conditions 3.7.2.c, 3.7.2.d, 3.7.2.ee, and 3.7.2.gg have all been updated.
  - Conditions 3.7.2.j and 3.7.2.cc have been removed since the facility has decommissioned and removed Coal Handling.
- Section 4.0
  - Conditions 4.1.1 – 4.1.21, 4.1.24 – 4.1.25, 4.2.1 – 4.2.16, 4.3.1 – 4.3.20, 4.4.1 – 4.4.8, 4.4.10 – 4.4.20, 4.4.22 – 4.4.23, and 4.5.1 – 4.5.6 were removed.
    - These conditions were for Boilers No. 2-6, the Ash Handling System, and the Sorbent silos that have been decommissioned, disconnected, and are not in use.
- Section 8.0
  - Condition 8.4.2.b was updated to reflect the changes made under R13-2654F issued on January 25, 2022
- Section 9.0
  - Conditions 9.1.4, 9.1.8, 9.3.3, 9.4.2, 9.4.4, and 9.5.4 were updated as a result of changes to 40 C.F.R. 60 Subpart IIII, 40 C.F.R. 60 Subpart JJJJ, and 40 C.F.R. 63 Subpart ZZZZ.

- The requirements of 40 C.F.R. §60.4214(d) were added as condition 9.5.5.
- Appendices
  - Former Appendices A, B, and E have been removed since the referenced equipment has been decommissioned, disconnected, and is not in use.

### 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 Dc – “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.”** This subpart applies to each steam generating unit that commences construction, modification, or reconstruction after June 9, 1989 and has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. All the boilers in Power and Service Support Area have a maximum design heat input capacity of more than 100 MMBtu/hr
- b. **40 C.F.R. 60, Subpart E – “Standards of Performance for Incinerators.”** The Power and Support Services Area does not operate any equipment which meets the definition of an incinerator as specified in 40 C.F.R. §60.51.
- c. **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 petroleum liquid storage tanks in the Power and Service Support Area with a storage capacity greater than 151,412 liters, constructed, reconstructed, or modified after June 11, 1973 and prior to May 19, 1978.
- d. **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 petroleum liquid storage tanks in the Power and Service Support Area with a storage capacity greater than 151,416 liters for which construction, reconstruction, or modification commenced after May 18, 1978 and prior to July 23, 1984.
- e. **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 volatile organic liquid storage tanks in the Power and Service Support Area with a storage capacity greater than or equal to 75 m<sup>3</sup> for which construction, reconstruction, or modification commenced after July 23, 1984.
- f. **40 C.F.R. 60, Subpart O – “Standards of Performance for Sewage Treatment Plants.”** The Power and Service Support Area does not operate an incineration unit or boiler to burn sludge from a municipal sewage treatment plant.
- g. **40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry.”** The Power and Service Support Area does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.
- h. **40 C.F.R. 60, Subpart DDD - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.”** The Power and Service Support Area does

- not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
- i. **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.”** The Power and Service Support Area does not produce any of the chemicals listed in §60.707 as a product, co-product, by-product, or intermediate.
  - j. **40 C.F.R. 60, Subpart CCCC – “Standards of Performance for Commercial and Industrial Solid Waste Incineration units for Which Construction is Commenced after November 30, 1999 or for Which Modification or Reconstruction is Commenced on or After June 1, 2001.”** The Power and Service Support Area does not operate a commercial and industrial solid waste incineration (CISWI) unit as defined by 40 C.F.R. §60.2265.
  - k. **40 C.F.R. 60, Subpart DDDD – “Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units that Commenced Construction on or Before November 30, 1999.”** The Power and Service Support Area does not operate a commercial and industrial solid waste incineration (CISWI) unit as defined by 40 C.F.R. §60.2875.
  - l. **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 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in the Power and Service Support Area.
  - m. **40 C.F.R. 61, Subpart FF – “National Emission Standard for Benzene Waste Operations.”** The Power and Service Support Area, specifically the Wastewater Treatment Plant, is not subject to this subpart other than the requirements of 40 C.F.R. §61.342(a) to perform an annual assessment of applicability and the record keeping requirements of 40 C.F.R. §§61.356(a) and 61.356(b).
  - n. **40 C.F.R. 63, Subpart F – “National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry.”** 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
  - o. **40 C.F.R. 63, Subpart G – “National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater.”** 40 C.F.R. 63, Subpart G does not apply to the Power and Service Support Area because they do not handle or treat a Group 1 wastewater stream. Applicable recordkeeping and reporting requirements for Group 2 wastewater streams are the responsibility of the producing area subject to the MACT standard and not the wastewater treatment area.
  - p. **40 C.F.R. 63, Subpart H - “National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.”** 40 C.F.R. 63 Subpart H does not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
  - q. **40 C.F.R. 63, Subpart Q – “National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers.”** The Power and Service Support Area does not operate any cooling towers using chromium based treatment chemicals.
  - r. **40 C.F.R. 63, Subpart T – “National Emission Standards for Halogenated Solvent Cleaning.”** The Power and Service Support Area does not operate any solvent cleaning machines containing the halogenated cleaning solvents specified in 40 C.F.R. §63.460(a).

- s. **40 C.F.R. 63, Subpart DD – “National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations.”** This subpart applies to units that receive waste/wastewater from off-site operations for treatment or recovery and the off-site waste contains hazardous air pollutants. This subpart does not apply to the Wastewater Treatment Plant at Chemours Washington Works because the treatment of off-site wastewater is not the predominate activity performed at the Washington Works facility as required in 40 C.F.R. §63.680(a)(2)(iii)(B).
- t. **40 C.F.R. 63, Subpart EEE – “National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors.”** The Power and Service Support Area does not operate any equipment meeting the definition of a hazardous waste combustor as specified in 40 C.F.R. §63.1201(a).
- u. **40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.”** The Power and Service Support Area does not produce the materials listed in 40 C.F.R. §63.1310.
- v. **40 C.F.R. 63, Subpart EEEE – “National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline).”** The Power and Service Support Area does not operate an organic liquids distribution (OLD) operation or does not handle material organic liquids as defined in §63.2406.
- w. **40 C.F.R. 82, Subpart B - “Protection of Stratospheric Ozone.”** This subpart requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing the equipment need to be licensed. The Power and Service Support Area does not conduct motor vehicle maintenance involving CFCs on site.
- x. **40 C.F.R. 82, Subpart C – “Protection of Stratospheric Ozone.”** This subpart bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. The Power and Service Support Area does not use, manufacture, nor distribute these materials.
- y. **45CSR6 – “To Prevent and Control Air Pollution from Combustion of Refuse.”** The Power and Service Support Area does not engage in the combustion of refuse in any installation or equipment.
- z. **45CSR18 – “To Prevent and Control Emissions from Commercial and Industrial Solid Waste Incineration Units.”** The Power and Service Support Area does not operate any equipment defined by 45CSR§18-2.11 as a commercial and industrial solid waste incineration (CISWI) unit.
- aa. **45CSR§21-40 – “Other Facilities that Emit Volatile Organic Compound (VOC).”** None of the emission sources in the Power and Service Support Area have maximum theoretical emissions of 6 pounds per hour or more and are subject to the requirements of this section. In addition, 45CSR§21-40.1.d. specifically exempts wastewater treatment facilities from the requirements in 45CSR§21-40.

### **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: October 31, 2022

Ending Date: November 30, 2022

### **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 57<sup>th</sup> Street SE  
Charleston, WV 25304  
nikki.b.moats@wv.gov  
304/926-0499 ext. 41282

### **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)**

No comments received.