

# Fact Sheet



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

Permit Number: **R30-10700001-2020**  
Application Received: **February 28, 2019**  
Plant Identification Number: **03-54-107-00001**  
Permittee: **DuPont Specialty Products USA, LLC**  
Business Unit: **Filaments Production (9 of 14)**  
Facility Name: **Washington Works**  
Mailing Address: **P.O. Box 2800, Washington, WV 26181-2800**

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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.

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### **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**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Group 9 Potential Emissions</b>	<b>2018 Facility Wide Actual Emissions</b>
Carbon Monoxide (CO)	0.81	12.86
Nitrogen Oxides (NO <sub>x</sub> )	0.11	39.91
Particulate Matter (PM <sub>2.5</sub> )	0.56	45.09
Particulate Matter (PM <sub>10</sub> )	5.10	55.98
Total Particulate Matter (TSP)	25.52	58.76
Sulfur Dioxide (SO <sub>2</sub> )	0.01	0.81
Volatile Organic Compounds (VOC)	6.25	81.20

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Group 9 Potential Emissions</b>	<b>2018 Facility Wide Actual Emissions</b>
Total HAP's	2.11	10.18

*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, over 10 tons per year of an individual HAP, and over 25 tons per year aggregate HAP's. Due to the facility-wide potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year aggregate HAPs, DuPont Specialty Products USA, 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) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	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 45CSR§21-30	No objectionable odors. 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**

1. Previous Condition 5.2.1 is a test method and has been moved to Condition 5.3.1.
2. Previous Condition 5.3.1 is a recordkeeping requirement and moved to Condition 5.4.1.
3. Previous Condition 5.4.1 is a reporting requirement and moved to Condition 5.5.1.
4. Current Conditions 5.1.1, 5.3.1, and 5.4.1 are based upon 45CSR§21-30 and therefore “State Enforceable Only” has been added to the citations.

The potentials to emit (PTE) have changed from the previous renewal. The reasoning is described below:

Carbon Monoxide - (0.54 TPY to 0.81 TPY) – The Parts Burnout Oven (F18) was not included in the CO emissions calculations in the 2014 Title V application and has been corrected in this renewal.

Particulate Matter 2.5/10/TSP - (0.15/1.31/6.56 TPY to 0.56/5.10/25.52 TPY) – The current estimate is based upon the Title V emission limits extrapolated to full capacity at 8,760 hrs/yr.

VOC's – (2.12 TPY to 6.25 TPY) – The 2014 estimates did not include the Parts Burnout Oven (F18), the Metal Parts Degreaser (F39), and the #13 Spinner (F46). The corrected estimates for 2014 are 7.84 TPY. For 2019, the VOC emission estimates for the Metal Parts Degreaser (F39) has reduced due to the AP42 factor (Chapter 4.6) used to calculate VOC emissions. Additionally, the #19 Spinner (F16) was removed from service.

### **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: December 18, 2019

Ending Date: January 17, 2020

### **Point of Contact**

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

Mike Egnor  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478  
michael.egnor@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.