

# Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 1, 2021.

Permit Number: **R30-10700182-2021 (Part 2 of 14)**

Application Received: **October 24, 2023**

Plant Identification Number: **03-54-10700182**

Permittee: **The Chemours Company FC, LLC**

Facility Name: **Washington Works**

Business Unit: **Fluoropolymers**

Mailing Address: **P.O. Box 1217, Washington, WV 26181-1217**

Permit Action Number: *SM02*      Revised: *Draft/Proposed*

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Physical Location: Washington, Wood County, West Virginia  
UTM Coordinates: 442.310 km Easting • 4,346.800 km Northing • Zone 17  
Directions: From I-77, take the Route 50 Bypass around Parkersburg towards Ohio. Take the last exit prior to the bridge exit from the Route 50 bypass on to DuPont Road. At the light turn left on to DuPont Road. Chemours Washington Works is approximately ½ mile on DuPont Road on the righthand side.

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### Facility Description

Within the Fluoropolymers Business Unit, there are the following Fluoroproduct production areas: C1, C2, C3, C4, T1-T4 and T7, T5, and T6. Each area produces a product or family of products by varying operating conditions and small adjustments to raw material ratios or material feed rates.

This application incorporates the requirements from minor NSR permit R13-3645 for the construction of a new production area (C4 Area) which will process polymers from other units. This project involves removing materials from what is essentially a warehouse and installing new equipment and utility fixtures. The new process includes an extruder which will produce a variety of polymer products for use by downstream customers and a cleaning system to remove excess polymers from processing equipment.

### Emissions Summary

This modification results in the following emission changes:

Pollutant	Change in Emissions, TPY
VOC	0.49
PM <sub>10</sub>	0.05
Hydrogen Fluoride (HAPs)	0.04

### 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. Therefore, Chemours 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	To Prevent and Control Particulate Matter Air Pollution From Manufacturing Processes and Associated Operations
	45CSR13	Preconstruction permits for minor sources.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	40 C.F.R. 63 Subpart FFFF	MON MACT
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

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> )
R13-3645	March 12, 2024	

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 Title V significant modification incorporates the applicable requirements for the new C4 Area permitted under R13-3645 on March 12, 2024. Changes to the Title V operating permit include the following:

- Addition of C4 Area equipment to the Section 1.1 Emission Units Table. This equipment includes two hoppers (C4AA and C4AB), an extruder (C4AC), a treater (C4AD), a cleaner (C4AE), a baghouse (C4AAC1) to control emissions from the hoppers, and a liquid ring vacuum pump (C4AEC1) to control emissions from the cleaner.
- Addition of R13-3645 to the table of active R13, R14, and R19 permits.
- Citations for and references to R13-3645 have been added to applicable 45CSR7 and 45CSR21 conditions in Facility-Wide Requirements Section 3.0 (see conditions 3.1.9, 3.1.10, 3.1.14, 3.1.15, 3.1.16, 3.1.17, 3.2.2, 3.2.4, 3.3.2, 3.3.3, and 3.4.7). However, according to the engineering evaluation for R13-3645, the new equipment does not emit VOCs at a rate greater than or equal to 6 lbs/hour.
- Citations for R13-3645 have been added to the Facility-Wide conditions 3.1.21, 3.1.22, 3.4.1, 3.4.6, and 3.4.9.
- Section 11.0 has been added and includes the applicable requirements from R13-3645 and 45CSR7 for the C4 Area.
  - The cleaner (C4AE) is subject to the hourly and annual PM<sub>10</sub> emission limits of condition 11.1.1. The less stringent hourly particulate matter emission limit calculated from 45CSR§7-4.1 for a type 'd' source was streamlined with the condition 11.1.1 hourly limit. To demonstrate compliance with the emission limits, the permittee is required by condition 11.2.2 to calculate emissions and maintain records using the forms in Appendix F (condition 11.4.1). Also, condition 11.1.5 requires the facility to maintain and operate their control devices and maintain records of maintenance activities, and of malfunctions and operational shutdowns; and condition 11.2.3 requires the facility to install interlocks on their liquid-ring vacuum pump. Operating, maintaining, and monitoring the control device will also be used to demonstrate compliance with the emission limits.
  - The cleaner (C4AE), treater (C4AD), and extruder (C4AC) are subject to hourly and annual VOC and HAP emissions limits in conditions 11.1.2 and 11.1.3. To demonstrate compliance with the emission limits, the permittee is required by condition 11.2.2 to calculate emissions and maintain records using the forms in Appendix F (condition 11.4.1). Also, condition 11.1.5 requires the facility to maintain and operate their control devices and maintain records of filter changes and maintenance activities, and of malfunctions and operational shutdowns; and condition 11.2.3 requires the facility to install interlocks on their liquid-ring vacuum pump. Operating,

maintaining, and monitoring the control device will be used as an additional means to demonstrate compliance with the emission limits for the cleaner.

- The hoppers (C4AA and C4AB) are required by condition 11.1.4 to be vented to the baghouse (C4AAC1). To demonstrate compliance with this requirement, the facility is required by condition 11.1.5 to maintain and operate the baghouse and maintain records of filter changes and maintenance activities, and of malfunctions and operational shutdowns. The facility is also required to maintain a low delta P interlock and a high delta P alarm as specified in condition 11.2.3.
- The particulate matter emission sources (C4AEE and C4AAE) are subject to the opacity limits of 45CSR§§7-3.1 and 3.2 (conditions 11.1.6 and 11.1.7). To demonstrate compliance with these limits, monthly opacity monitoring and record keeping of this monitoring is required under condition 11.2.1.
- Record keeping forms for the C4 Area have been added as Appendix F.
- 40 CFR 63 Subpart FFFF – *National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing (MON MACT)*. This significant modification is adding processes to an existing Miscellaneous Chemical Manufacturing Process Unit (MCPU) subject to the requirements of the MON MACT. However, the new C4 process will not be introducing any new Group 1 streams and the new process combined with existing upstream processes are considered Group 2 batch process vent streams due to the collective uncontrolled organic HAP emissions being less than 10,000 pounds per year for the process. As such, there were no new applicable MON requirements for the C4 Area.

### **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: August 1, 2024  
Ending Date: September 3, 2024

### **Point of Contact**

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

Jonathan Carney  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/926-0499 ext. 41247  
Jonathan.W.Carney@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.