

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 February 22, 2021.

Permit Number: **R30-10700208-2021 (8 of 14)**
Application Received: **November 1, 2023**
Plant Identification Number: **03-54-107-00208**
Permittee: **DuPont Polymer Products, LLC**
Facility Name: **Washington Works**
Business Unit: **Specialty Compounding Division**
Mailing Address: **P.O. Box 2600 Washington, WV 26181-2600**

Permit Action Number: *MM04* Revised: *March 11, 2024*

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 442.27 km Easting • 4,346.57 km Northing • Zone 17
Directions: From I-77, take Exit 176 to U.S. Route 50W toward Athens, Ohio. At the last exit prior to the bridge, exit from Route 50 Bypass onto DuPont Road (Route 892). At the light, turn left onto DuPont Road. Approximately one mile from the turn, the facility is on the right.

Facility Description

DuPont Specialty Products USA, LLC - Washington Works (DuPont) is a multiple business, multiple product line facility that produces plastic resins and their associated feedstock materials. DuPont divided the initial Title V Permit Application into fourteen separate business units, each of which received a Title V Permit. This permit is Group 8 of 14, Specialty Compounding Division, which is a segment of DuPont that produces polymer blends and mixtures through the use of mixing and extrusion facilities. Specialty Compounding Division takes raw materials, generally in a pellet or powder form, and mixes them together

to create high performance plastic blends and polymers for use in automotive, aerospace, and other commercial manufacturing efforts located off-site.

This minor modification incorporates the changes made under R13-1533P for the replacement of the control device on Bulk Storage Silo S293-S-01F.

Emissions Summary

This modification results in the following emission changes:

Pollutant	Change in Potential Emissions (+ or -), TPY
PM	+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 pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAP. Therefore, DuPont 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	NSR Permit Requirements.
	45CSR30	Operating permit requirement.
State Only:	None	

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>)
R13-1533P	December 5, 2023	

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 modification is to replace the control device on Silo F (S293-S-01F) with a new bag filter system air pollution control device (S293-C-01F). Changes associated with this modification are as follows:

- The installation year of S293-E-01F was changed from 2011 to 2023 in the Emission Units Table.
- The particulate matter emission limits in condition 4.1.1 for Emission Point ID Number S293-E-01F were changed from 0.01 lbs/hr and 0.01 tpy to 0.07 lbs/hr and 0.04 tpy respectively.
- The existing monitoring, recordkeeping and reporting requirements for Emission Point ID Number S293-E-01F did not change as a result of the replacement of the control device.

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

Ending Date: Not Applicable

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 57th Street SE
Charleston, WV 25304
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)

Not applicable.