

# Fact Sheet



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

Permit Number: **R30-10700182-2023 (14 of 14)**  
Application Received: **May 05, 2023**  
Plant Identification Number: **03-54-107-00182**  
Permittee: **The Chemours Company FC, LLC**  
Facility Name: **Washington Works**  
Business Unit: **Central Maintenance Services**  
Mailing Address: **P.O. Box 1217 Washington, WV 26181-1217**

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Physical Location: Washington, Wood County, West Virginia  
UTM Coordinates: 442.368 km Easting • 4,346.679 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 to exit from the Route 50 Bypass onto DuPont Road. At the light turn left on DuPont Road. The main entrance is at the first traffic light on DuPont Road.

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### **Facility Description**

The Chemours Company FC, LLC's Washington Works is a chemical plant that produces plastic resins. The Central Maintenance Services (CMS) unit performs operations such as welding, painting, insulation fabrication and installation, and vehicle refueling in support of specific maintenance requirements for other business units at the site. This group manages the refrigerant systems and their maintenance as well as all specialized in-house maintenance services that support the manufacturing units on-site.

SIC: 2821; NAICS: 325211

**Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions (14 of 14) Only</b>	<b>2022 Actual Emissions Facility-Wide</b>
Carbon Monoxide (CO)	None	138.38
Nitrogen Oxides (NO <sub>x</sub> )	None	170.03
Particulate Matter (PM <sub>2.5</sub> )	< 0.01	1.20
Particulate Matter (PM <sub>10</sub> )	0.40	10.36
Total Particulate Matter (TSP)	0.48	11.03
Sulfur Dioxide (SO <sub>2</sub> )	None	1.04
Volatile Organic Compounds (VOC)	0.06	424.32
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions (14 of 14) Only</b>	<b>2022 Actual Emissions Facility-Wide</b>
Total HAPs	0.14	15.83

*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 Carbon Monoxide, Nitrogen Oxides, and Volatile Organic Compounds; over 10 tons per year of Methylene Chloride, Formaldehyde, and Toluene; and over 25 tons per year of aggregate Hazardous Air Pollutants (HAPs). 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:	45CSR6	Control of Air Pollution from Combustion of Refuse.
	45CSR7	To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations.
	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	Requirements for Operating Permits.
	45CSR34	Emission Standards for Hazardous Air Pollutants.

	40 C.F.R. Part 61	Asbestos inspection and removal.
	40 C.F.R. Part 63 Subpart JJ	National Emission Standards for Wood Furniture Manufacturing Operations.
	40 C.F.R. Part 63 Subpart GGGGG	National Emission Standards for Hazardous Air Pollutants: Site Remediation.
	40 C.F.R. Part 82 Subpart F	Ozone depleting substances.
State Only:	45CSR4	No objectionable odors.
	45CSR§21-30	Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds: 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
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**

The following changes were made to the Title V operating permit:

1. The mailing address for the facility has been corrected to P.O. Box 1217 Washington, WV 26181-1217.
2. Section 2.0. – General Conditions
  - a. In Condition 2.1.3., the reference to 45CSR§30-2.12. has been replaced with 45CSR§30-2.39 which defines “Secretary”.
  - b. The authority of Condition 2.11.4. has been updated to 45CSR§30-2.40. due to a change in 45CSR30.
  - c. Section 2.17., which previously contained emergency requirements, has been removed from the permit and replaced with “Reserved” as the requirements for emergencies and affirmative defense were removed from 45CSR30.
  - d. The authority of Condition 2.22.1. has been updated to 45CSR§30-5.3.e.3.B. due to the repeal of Rule 45CSR38 by Senate Bill No. 163.
3. Section 3.0. – Facility-Wide Requirements

- a. Condition 3.5.3. has been updated to show changes that have been made to the U.S. EPA designee/address.
  - b. 45CSR§30-8 has been revised and no longer requires the submission of certified emissions statements. Condition 3.5.4. has been updated accordingly.
  - c. The requirements of Conditions 3.5.7. and 3.5.8.a.1. have been removed from the operating permit, and the conditions have been marked as “Reserved.” due to the removal of the sections of 45CSR30 that related to emergencies and affirmative defense.
  - d. Due to revisions in 45CSR§30-5.1.c.3.C.2., “telefax” has been updated to “email” in Condition 3.5.8.a.2.
4. Section 4.0. – Bead Blast Units and Spray Booths

- a. Condition 4.4.3. of the operating permit has been revised. This condition contains recordkeeping requirements for the spray booths to demonstrate compliance with the particulate matter and opacity limits of 45CSR7 (Conditions 4.1.1. through 4.1.3.). Previously, the permittee was required to maintain records of the number of disposable aerosol cans used at each Spray Booth (M15/1B27P1, M1/1B18P1, and M15/1B15P) as well as the name and identification number of the coating used. In an email dated May 08, 2023, the permittee requested to amend the condition by removing the recordkeeping requirements for the details of the coating used.

The 45CSR7 particulate matter emission limits and the potential emissions of particulate matter for each of the paint booths are as follows:

Emission Units	PM Potential Emissions	45CSR7 PM Emission Limit
	pph	pph
M15/1B15P	0.0071	0.054
M15/1B27P1	0.18	0.23
M1/1B18P1	0.14	0.96

Because the actual emissions from each spray booth are calculated based on the number of aerosol cans used and because the potential emissions of particulate matter from each spray booth are below the respective emission limit, compliance with the particulate matter and opacity limits should be demonstrated by maintaining records of the number of aerosol cans used at each spray booth. Therefore, the requirement to maintain records of the coating’s name and identification number have been removed from Condition 4.4.3.

**Non-Applicability Determinations**

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

1. 40 C.F.R. Part 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 constructed in Central Maintenance Services during these dates.
2. 40 C.F.R. Part 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 constructed in Central Maintenance Services during these dates with a capacity greater than 40,000 gallons.
3. 40 C.F.R. Part 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 constructed in Central Maintenance Services after the effective date with a design capacity greater than 75 m<sup>3</sup> (19,812.9 gallons).

4. 40 C.F.R. Part 60 Subpart VV – “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.” Central Maintenance Services does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.
5. 40 C.F.R. Part 60 Subpart DDD – “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.” Central Maintenance Services does not manufacture polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate) for which this rule applies.
6. 40 C.F.R. Part 60 Subpart RRR – “Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.” Central Maintenance Services does not produce any of the chemicals listed in 40 C.F.R. §60.707 as a product, co-product, by-product, or intermediate.
7. 40 C.F.R. Part 61 Subpart V – “National Emission Standards for Equipment Leaks (Fugitive Emissions Sources).” This subpart applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in Central Maintenance Services in a manner that qualifies them under the rule.
8. 40 C.F.R. Part 63 Subpart F – “National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry.” 40 C.F.R. Part 63 Subpart F does not apply to Central Maintenance Services manufacturing process units because they do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
9. 40 C.F.R. Part 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. Part 63 Subpart G does not apply to Central Maintenance Services manufacturing process units because they do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
10. 40 C.F.R. Part 63 Subpart H – “National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.” 40 C.F.R. Part 63 Subpart H does not apply to Central Maintenance Services manufacturing process units because they do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
11. 40 C.F.R. Part 63 Subpart JJJ – “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.” Central Maintenance Services does not produce the materials listed in 40 C.F.R. §63.1310.
12. 40 C.F.R. Part 63 Subpart FFFF – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.” Central Maintenance Services does not manufacture any material or family of materials defined in 40 C.F.R. §§63.2435(b)(1)(i) through (v).
13. 40 C.F.R. Part 63 Subpart IIII – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks.” Central Maintenance Services does not engage in the surface coating of new automobile or light-duty truck bodies or body parts for new automobiles or light-duty trucks.
14. 40 C.F.R. Part 63 Subpart MMMM – “National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.” There are no surface coating activities conducted in Central Maintenance Services subject to the requirements of this rule.

15. 40 C.F.R. Part 63 Subpart PPPP – “National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.” Central Maintenance Services does not produce an intermediate or final product that meets the definition of “surface coated” plastic part.
16. 40 C.F.R. Part 63 Subpart WWWW – “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” Central Maintenance Services 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.
17. 40 C.F.R. Part 63 Subpart HHHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” Central Maintenance Services does not produce, blend, or manufacture coatings as part of the manufacturing process.
18. 40 C.F.R. Part 82 Subpart C – “Protection of Stratospheric Ozone.” Bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. Central Maintenance Services does not use, manufacture, nor distribute these materials.
19. 45CSR§21-19 – “Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds: Coating of Miscellaneous Metal Parts.” The operations of Central Maintenance Services are outside of the SIC grouping to which this section of 45CSR21 applies.
20. 45CSR§21-40 – “Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds: Other Facilities that Emit Volatile Organic Compounds (VOC).” None of the emission sources in Central Maintenance Services have maximum theoretical emissions of six pounds per hour or more and are not subject to the requirements of this section.
21. 45CSR27 – “To Prevent and Control the Emissions of Toxic Air Pollutants.” Central Maintenance Services does not have emission sources of toxic air pollutants as listed in 45CSR27.

### **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 29, 2023

Ending Date: October 30, 2023

### **Point of Contact**

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

Sarah Barron  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/926-0499 ext. 41915  
sarah.k.barron@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)**

None.