

Fact Sheet



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

Permit Number: **R30-10700001-2020**
Application Received: **October 10, 2019**
Plant Identification Number: **03-54-10700001**
Permittee: **DuPont Specialty Products USA, LLC**
Facility Name: **Washington Works**
Business Unit: **Engineering Polymers (EPC) – East (Part 6 of 14)**
Facility Name: **Washington Works**
Mailing Address: **P.O. Box 2800, Washington, WV 26181-2800**

Revised: N/A

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 exit from the Route 50 bypass on to DuPont Road. At light turn left on DuPont road. Approximately ½ mile from the turn you will see the site on your right and be approaching the exit from the road for the main gate to the facility.

Facility Description

In the EPC - East Production Area (Part 6 of 14), polymer resins and other ingredients (such as plasticizers, fillers, reinforcing agents, anti-oxidants, flame-retardants, and colorants) are melt compounded through an extrusion/cutting operation into a final pelletized product.

Emissions Summary

Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions For EPC – East (6 of 14)	2019 (Facility Wide) Actual Emissions
Carbon Monoxide (CO)	1.34	10.83
Nitrogen Oxides (NO _x)	N/A	38.06
Particulate Matter (PM _{2.5})	1.17	9.50
Particulate Matter (PM ₁₀)	19.30	10.45
Total Particulate Matter (TSP)	26.46	45.63
Sulfur Dioxide (SO ₂)	N/A	0.68
Volatile Organic Compounds (VOC)	3.36	78.80

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions For EPC – East (6 of 14)	2019 (Facility Wide) Actual Emissions
Total HAPs	0.62	7.40

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

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 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.

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.
	45CSR13	Preconstruction permits for minor sources.
	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 Hazardous Air Pollutants.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 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	Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds
	45CSR27	Best Available Technology for 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>)
R13-2244I	April 27, 2010	PD13-090 November 26, 2013
R13-2617L	April 10, 2020	

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 a renewal Title V permit. The following changes were made with this renewal:

- The company name has been updated from “E. I. du Pont de Nemours and Company” to DuPont Specialty Products USA, LLC.
- The Part 6 of 14 name has been updated from “Engineering Polymers – East” to “Engineering Polymers (EPC) – East”.
- The mailing address has been updated from “P.O. Box 1217, Washington, WV 26181-1217” to “P.O. Box 2800, Washington, WV 26181-2800”.
- The type of business entity has been updated from “Corporation” to “LLC”.
- The control device for the CP7 Extruder Die Exhaust has been updated to “280-140C”. This control device was listed as an inherent control device in R13-2244I.

- The emission unit “280-207S” has been added to the emission units table.
- The NSR Permit R13-2617I has been updated to R13-2617K in the Section 1.2 active R13 permits table.
- The contact information for DAQ and US EPA has been updated in Conditions 3.5.3, 3.5.5, and 3.5.6.
- 40 C.F.R. 60, Subpart VVa has been added as Condition 3.7.2.e to the non-applicability section.
- A 76 gallon solvent parts cleaner (280-207S) that was installed in the 1980’s has been identified as being subject to 45CSR§21-30. Condition 4.1.12 has been added to provide the applicable requirements of 45CSR§§21-30.3.a.4 through 9. Condition 4.3.7 has been added to require the specific test method used to measure the solvent vapor pressure required by 45CSR§21-30.4.e. Condition 4.4.10 has been added to include the recordkeeping requirements of 45CSR§21-30.5.
- Emission Point 280-150E was added to Condition 4.1.3 to match the R13-2244I Permit.

On November 26, 2019, the facility was issued a no permit needed for PD13-090 for the construction of additional fugitive dust control system. From that letter the following changes to the renewal have been made:

- The emission point id and control device has been updated to “280-206E” and “280-206C” for the following emission units: 280-072S CP7 Cutter, 280-112S CP7 B1 Hopper, 280-191S CP8 Cutter, 280-197S CP7 Main Flake Hopper, 280-198S CP8 Main Flake Hopper, 280-CP8 CP8 Extruder, and 280-CP9 CP9 Extruder in the Section 1.1 Equipment Table. These points have been updated in Condition 4.1.1 as appropriate.
- The references to “280-112E” and “280-138E” have been changed to “280-206E” in Conditions 4.1.4 and 4.1.5. The reference to 280-187E has been removed.
- “280-138E” has been changed to “280-206E” in Appendix B.

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 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 storage tanks in the EPC-East facility subject to this requirement.
- b. 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 storage tanks in the EPC-East facility subject to this requirement.
- c. 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 storage tanks in the EPC-East facility subject to this requirement.
- d. 40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification

- Commenced After January 5, 1981, and on or Before November 7, 2006.” The EPC-East facility does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.
- e. 40 C.F.R. 60, Subpart VVa – “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006”. The EPC-East facility does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489a.
 - f. 40 C.F.R. 60, Subpart DDD - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.” The EPC-East facility does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
 - g. 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 EPC-East facility does not produce any of the chemicals listed in 40 C.F.R. §60.707 as a product, co-product, by-product, or intermediate.
 - h. 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 EPC-East facility.
 - i. 40 C.F.R. 63, Subpart H - “National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.” 40 C.F.R. 63 Subparts F, G, and H do not apply to the EPC-East manufacturing process units, as they do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
 - j. 40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins. The EPC-East facility does not produce the materials listed in 40 C.F.R. §63.1310.
 - k. 40 C.F.R. 63, Subpart WWWW “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Productions.” The EPC-East facility 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.
 - l. 40 C.F.R. 63, Subpart PPPP – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.” The EPC-East facility does not produce an intermediate or final product that meets the definition of “surface coating” plastic part.
 - m. 40 C.F.R. 63, Subpart DDDDD – “National Emission Standards for Hazardous Air Pollutants: Industrial/Commercial/Institutional Boilers and Process Heaters.” The EPC-East facility does not own or operate an industrial, commercial, or institutional boiler or process heater as defined in 40 C.F.R. §63.7575.
 - n. 40 C.F.R. 63, Subpart HHHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” The EPC-East facility does not produce, blend, or manufacture coatings as part of the manufacturing process.
 - o. 40 C.F.R. 82, Subpart B - “Protection of Stratospheric Ozone.” Requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing equipment need to be licensed. The EPC-East facility does not conduct motor vehicle maintenance involving CFCs on site.

- p. 40 C.F.R. 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. The EPC-East facility does not use, manufacture, nor distribute these materials.
- q. 45CSR2 – “To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.” The EPC-East facility does not contain any fuel burning units.
- r. 45CSR10 – “To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.” The EPC-East facility does not have emission sources of sulfur oxides subject to this rule.
- s. 45CSR16 – “Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60.” The EPC-East facility is not subject to any requirements under 40 C.F.R. 60.
- t. 45CSR17 – “To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.” Per 45CSR§17-6.1, EPC-East is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.
- u. 45CSR§21-40 – “Other Facilities that Emit Volatile Organic Compound (VOC).” None of the emission sources in EPC-East have maximum theoretical emissions of 6 pounds per hour or more and are not subject to the requirements of this section.

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: July 24, 2020
Ending Date: August 24, 2020

Point of Contact

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

Michael Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41255
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)

None.