

Memo to File

To: Bev McKeone
From: Mike Egnor
Date: April 19, 2016
Re: PD 16-027 • Chemours • Washington Works • 107-00182

This office received a permit determination request from Chemours April 15, 2016 and dated April 13, 2016. The determination request is to add a 1,000 gallon Gasoline Storage Tank (VGDT) to the Facilities, Construction, and Support Area to be used to dispense gasoline fuel into vehicles or containers.

There will be an increase in emissions of 10.4 pounds per hour and 0.57 tons per year of VOC's and 0.64 pounds per hour and 0.035 tons per year of HAP's as a result of the addition of this tank. These numbers are well below the six pounds per hour and ten tons per year, or 144 pounds per day of criteria pollutants, and below two pounds per hour or five tons per year of HAP's that would trigger a NSR modification. The tank is subject to 45CSR§21-23.2.a.1 which requires that the tank be equipped with a functional submerged fill and 45CSR§21-23.3 which requires daily recordkeeping of gasoline delivered to the site and that these records be kept for a minimum of 3 years. As this does not meet the definition of a substantive requirement of an emission control rule under 45CSR§13-2.24.a, no permit is needed for the addition of the gasoline tank.

Evaluation Comments:

It is recommended that the facility modify their Part 12 of 14 Title V Permit to add this unit to the equipment table and add the applicable Rule 21 requirements. The facility has already submitted this modification.