



west virginia department of environmental protection

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MEMORANDUM

To: Beverly McKeone, NSR Program Manager

From: Mike Egnor, Engineer

Date: August 7, 2015

Subject: Class I Administrative Update R13-2391I for Chemours Washington Works

On May 22, 2015, The Chemours Company FC, LLC submitted an application for a Class I administrative update, R13-2391I. Chemours requested changes of references to CO-R21-97-47 to R13-3223 since the NSR Permit supersedes the Consent Order. Chemours also requested the removal of references to Emissions Source ID's C3IP and C3IQ as well as Emission ID C3IQE since these sources and emission point no longer exist. Emission Source C3JA still vents through Emission Point ID C3IPE so it will not be removed. The emission limits for Emission Point ID C3IPE has been changed from 0.80 lbs/hr and 0.58 TPY to 0.40 lbs/hr and 0.28 lbs/hr as a result of the removal of Emission Unit C3IP. This is in Condition A.3.

In addition, some minor changes were also made to this permit since it was reopened. Those changes include the following:

- 1) The citation to the consent order CO-R21-97-47 has been changed to R13-3223 in Condition B.6 and Table B.6.
- 2) References to Emission Sources C3IP and C3IQ as well as Emission Point ID C3IQE have been removed from this permit and attachments as the sources have been removed and the emission point no longer exists.
- 3) Changed the name of the Permittee and Plant ID No. from "E. I. DuPont de Nemours and Company, Inc." and "107-00001" to "The Chemours Company FC, LLC" and "107-00182, respectively.
- 4) Updated the Permit and references from R13-2391H to R13-2391I.

The overall reduction in emissions from the removal of Emission Units C3IP and C3IQ as a result of this Class I Administrative Update are 0.80 lbs/hr and 0.59 TPY of VOC's. None of the changes included in this Class I Administrative Update affected addition of equipment, control devices, or applicable requirements. The changes also involved clarification of requirements that were already applicable.