

Memo to File

To: Bev McKeone
From: Mike Egnor
Date: December 15, 2015
Re: PD 15-104 • DuPont • Washington Works • 107-00001

This office received a permit determination request from DuPont December 10, 2015 and dated December 9, 2015. When the facility was split between DuPont and Chemours, the entire facility was above the Rule 27 (TAP's) threshold for methylene chloride (i.e. 5,000 lbs/yr as given in Rule 13 Table 45-13A).

The Permit Determination request is to relocate sources that emit methylene chloride emissions. The DuPont facility, now separated from Chemours, is well below the 5,000 lbs/yr threshold that triggers Rule 27.

However, the facility does have Condition 5.1.2 of R13-2330G which limits methylene chloride to the laboratory hoods (L001-L040) to 0.04 tons per year. Attachment A of R13-2617I gives Best Available Technology "BAT" requirements to methylene chloride (L LabHoods) for DuPont.

The relocation of these emission sources would cause emission increases of 11.9 lbs/yr of VOC, 0.2 lbs/yr of methylene chloride, and 11.3 lbs/yr of total HAP's. These are all well below the 6 lbs/hr and 10 tons per year or more, or more than 144 pounds per calendar day of any regulated air pollutant as required by 45CSR§13-2.17.a, 2 pounds per hour or 5 tons per year of hazardous air pollutants as required by 45CSR§13-2.17.b, or 10 percent (i.e. 500 lbs/yr) of the methylene chloride emissions as required by 45CSR§13-2.17.c.

If the facility wishes to remove Condition 5.1.2 of R13-2330G and methylene chloride "BAT" requirements of R13-2617I, then they need to submit a Class 1 Administrative Update for each Permit.

Evaluation Comments:

If the facility wishes to remove Condition 5.1.2 of R13-2330G and methylene chloride "BAT" requirements of R13-2617I, then they need to submit a Class 1 Administrative Update, they would also need to submit a minor modification to remove these requirements from their R30-10700001-2013 Part 13 of 14 Permit.