

# Memo to File

**To:** Bev McKeone  
**From:** Mike Egnor  
**Date:** June 28, 2016  
**Re:** PD 16-040 • Chemours • Washington Works • 109-00182

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This office received a permit determination request from Chemours June 23, 2016 and dated June 21, 2016. The determination request is to add an additional operating scenario in order to empty the #5 Methyl Methacrylate Storage Tank for cleaning purposes. The contents would be pumped into empty chemical trailers in order to clean the storage tank. Emissions would be 0.85 lbs/hr and 0.0253 TPY of VOC's and HAP's. 45CSR13-4.2.b.1 requires a Class II administrative update to "Change a permit condition as necessary, to allow changes in...operating parameters...which results in an increase or no change in the emission of any existing regulated air pollutant..." Therefore a Class II Administrative Update would be required for the change in operating conditions. This would include a condition that would limit the number of cleanings, number of chemical trailer fills, and that submerged fill be used and that the facility minimize air pollutants during this process be added to the permit.

#### Evaluation Comments:

The facility has submitted a Title V Attachment S to add the additional operating scenario.