

Memo to File

To: Bev McKeone
From: Mike Egnor
Date: June 1, 2016
Re: PD 16-035 • DuPont • Washington Works • 109-00001

This office received a permit determination request from DuPont May 23, 2016 and dated May 18, 2016. The determination request is to replace a high efficiency dry paper filter particulate control system with a recirculating wet scrubber system for the treatment of the extrusion die vent. Although 45CSR13-2.17 states that a modification is not required because the control device is as efficient as the previous unit, 45CSR13-4.2 describes that Administrative Updates are not modifications. As the control device change is not "like for like", 45CSR13-4.2.b.1 requires a Class II administrative update to "Change a permit condition as necessary, to allow changes in...control equipment...which results in an increase or no change in the emission of any existing regulated air pollutant..." If there was a decrease in emissions due to the change in control devices, this could be done as a Class I Administrative Update without public notice. However, from the information included with the permit determination form, it indicates that there will be no emissions decrease of criteria pollutants. Therefore a Class II Administrative Update would be required for the change in particulate filters.

Evaluation Comments:

Additionally, a Class II Administrative Update would require a Title V minor modification. As the facility submitted a request for an administrative amendment for Title V, no action will be taken on the administrative amendment request.