

# Memo to File

**To:** Bev McKeone  
**From:** Mike Egnor  
**Date:** November 30, 2015  
**Re:** PD 15-097 • DuPont • Washington Works • 107-00001

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This office received a permit determination request from DuPont November 20, 2015 and dated November 18, 2015. When the facility was split between DuPont and Chemours, Chemours retained the majority of the maintenance equipment. DuPont is adding a paint booth, bead blaster, welding hood, and solvent metal cleaning source.

The Permit Determination request is to designate the paint booth, bead blaster, and welding hood as "de minimis sources" and not be required to be included in a Rule 13 Permit. It is also requested that any increase in emission from the addition of the solvent metal cleaning source is below Rule 13 permitting thresholds.

The paint booth, bead blaster, and welding hood are "de minimis" sources. Item 39 under the 45CSR13 Table 45-13B de minimis source list states " On-site plant maintenance and upkeep activities, including, lawn care, weed control, pest control, general repairs, cleaning, painting, surface coating, welding, plumbing, grinding, cutting, woodworking, janitorial activities, re-tarring roofs, installing insulation, and paving parking lots, provided that these activities are not conducted as part of a manufacturing process and are not related to the source's primary business activity; provided further, that for cleaning, surface coating and painting activities, the source is not subject to VOC or HAP control requirements and the source minimizes the generation of fugitive emissions of any regulated air pollutants; and provided further, that the source complies with the asbestos requirements in 45CSR15."

Since the equipment is used for on-site plant maintenance and is not part of a manufacturing process, no permit is needed for this equipment.

The solvent metal cleaning source would have insignificant emissions of VOC's which would be 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.

### Evaluation Comments:

The solvent metal cleaning source would be subject to the control measures with the requirements set forth in 45 CSR21 Section 30 for VOC's. Therefore they will need to add this source to their R30-10700001-2011 Part 5 of 14 Title V Permit.