

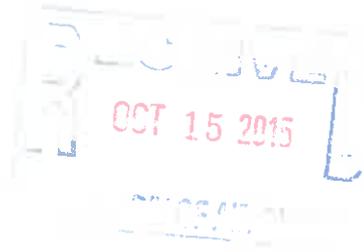


E. I. du Pont de Nemours and Company
Washington Works
Mail: P.O. Box 2800
Washington, WV 26181-1217

October 14, 2015

CERTIFIED MAIL – 7007 1490 0001 6676 6213
RETURN RECEIPT REQUESTED

Mr. W. Fred Durham, Director
Division of Air Quality
WV Department of Environmental Protection
601 57th Street
Charleston, West Virginia 25304



RE: Permit Determination Request for a de minimis Bandsaw

Dear Mr. Durham:

With this letter DuPont requests a permit determination to address the permit status of a bandsaw used for maintenance activities. The source and related vent have been listed on a Title V permit that covers maintenance and construction activities, R30-10700001-2015 Segment 12 of 14. This permit has been transferred to Chemours FC, LLC and Chemours has suggested that this source should be relocated to a DuPont Title V permit, R30-10700001-2011 Segment 5 of 14 which covers the production area where the bandsaw is located. But if the source is determined to be "de minimis" per WV Rule 13 and "insignificant" per WV Rule 30 then it can be removed from the Segment 12 permit and would not be added to the Segment 5 permit.

Should you have any questions or concerns regarding the actions described in this letter or any related matter, please contact me at 304-863-2202, or Chris Shoop at 304-863-2133.

Very truly yours,

C. R. Hill
SHE Manager
DuPont Washington Works

ENCLOSURE

CRH:ces/mlg

CC: Michel Egnor, Permitting
WVDEP - Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

E. I. du Pont de Nemours and Company
Shipping: 8480 DuPont Rd – Bldg 24
Washington, WV 26181



WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street, SE
Charleston, WV 25304
Phone: (304) 926-0475
www.dep.wv.gov/daq

**PERMIT DETERMINATION FORM
(PDF)**

FOR AGENCY USE ONLY: PLANT I.D. # _____
PDF # _____ PERMIT WRITER: _____

1. NAME OF APPLICANT (AS REGISTERED WITH THE WV SECRETARY OF STATE'S OFFICE):

E. I. du Pont de Nemours and Company

2. NAME OF FACILITY (IF DIFFERENT FROM ABOVE):

DuPont Washington Works

3. NORTH AMERICAN INDUSTRY CLASSIFICATION SYSTEM (NAICS) CODE:

3252111

4A. MAILING ADDRESS:

DuPont Washington Works
P.O. Box 2800
Washington WV 26181-1217

4B. PHYSICAL ADDRESS:

DuPont Washington Works
8480 DuPont Road, Building 24
Washington WV 26181

5A. DIRECTIONS TO FACILITY (PLEASE PROVIDE MAP AS ATTACHMENT A): See Map - From Charleston take I-77 north to the Route 50. Turn West on to Route 50 and use the bypass around Parkersburg. At the DuPont Road Exit - exit and at DuPont Road turn Left. The plant is approximately ¼ - ½ mile on the right side.

5B. NEAREST ROAD:

DuPont Road

5C. NEAREST CITY OR TOWN:

Parkersburg

5D. COUNTY:

Wood

5E. UTM NORTHING (KM):

4346.8331

5F. UTM EASTING (KM):

442.3767

5G. UTM ZONE:

17

6A. INDIVIDUAL TO CONTACT IF MORE INFORMATION IS REQUIRED:

Charles R. Hill

6B. TITLE:

SHE Manager

6C. TELEPHONE:

(304) 863-2202

6D. FAX:

(304) 863-2190

6E. E-MAIL:

Charles-R.F.Hill-1@dupont.com

7A. DAQ PLANT I.D. NO. (FOR AN EXISTING FACILITY ONLY):

107 - 00001

7B. PLEASE LIST ALL CURRENT 45CSR13, 45CSR14, 45CSR19 AND/OR TITLE V (45CSR30) PERMIT NUMBERS ASSOCIATED WITH THIS PROCESS (FOR AN EXISTING FACILITY ONLY):

**R30-10700001 Part 5 of 14
R30-10700001 Part 12 of 14**

7C. IS THIS PDF BEING SUBMITTED AS THE RESULT OF AN ENFORCEMENT ACTION? IF YES, PLEASE LIST: **No**

8A. TYPE OF EMISSION SOURCE (CHECK ONE):

- NEW SOURCE ADMINISTRATIVE UPDATE
 MODIFICATION OTHER (PLEASE EXPLAIN IN 11B)

8B. IF ADMINISTRATIVE UPDATE, DOES DAQ HAVE THE APPLICANT'S CONSENT TO UPDATE THE EXISTING PERMIT WITH THE INFORMATION CONTAINED HEREIN?

- YES NO

9. IS DEMOLITION OR PHYSICAL RENOVATION AT AN EXISTING FACILITY INVOLVED? YES NO

10A. DATE OF ANTICIPATED INSTALLATION OR CHANGE:

Not Applicable

10B. DATE OF ANTICIPATED START-UP:

Not Applicable

11A. PLEASE PROVIDE A DETAILED PROCESS FLOW DIAGRAM SHOWING EACH PROPOSED OR MODIFIED PROCESS EMISSION POINT AS ATTACHMENT B.

11B. PLEASE PROVIDE A DETAILED PROCESS DESCRIPTION AS ATTACHMENT C.

12. PLEASE PROVIDE MATERIAL SAFETY DATA SHEETS (MSDS) FOR ALL MATERIALS PROCESSED, USED OR PRODUCED AS ATTACHMENT D. FOR CHEMICAL PROCESSES, PLEASE PROVIDE A MSDS FOR EACH COMPOUND EMITTED TO AIR.

13A. REGULATED AIR POLLUTANT EMISSIONS:

⇒ FOR A NEW FACILITY, PLEASE PROVIDE PLANT WIDE EMISSIONS BASED ON THE POTENTIAL TO EMIT (PTE) FOR THE FOLLOWING AIR POLLUTANTS INCLUDING ALL PROCESSES.

⇒ FOR AN EXISTING FACILITY, PLEASE PROVIDE THE PROPOSED CHANGE IN EMISSIONS BASED ON THE PTE OF ALL PROCESS CHANGES FOR THE FOLLOWING AIR POLLUTANTS.

PTE FOR A GIVEN POLLUTANT IS TYPICALLY BEFORE AIR POLLUTION CONTROL DEVICES AND IS COLLECTED BASED ON THE MAXIMUM DESIGN CAPACITY OF PROCESS EQUIPMENT.

POLLUTANT	HOURLY PTE (LB/HR)	YEARLY PTE (TON/YR) (HOURLY PTE MULTIPLIED BY 8760 HR/YR) DIVIDED BY 2000 LB/TON
PM	No Change	See Process Description
PM ₁₀	No Change	"
VOCs	0	0
CO	0	0
NO _x	0	0
SO ₂	0	0
Pb	0	0
HAPs (AGGREGATE AMOUNT)	0	0
TAPs (INDIVIDUALLY)*	0	0
OTHER (INDIVIDUALLY)*	0	0

* ATTACH ADDITIONAL PAGES AS NEEDED

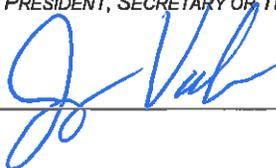
13B. PLEASE PROVIDE ALL SUPPORTING CALCULATIONS AS ATTACHMENT E.

CALCULATE AN HOURLY AND YEARLY PTE OF EACH PROCESS EMISSION POINT (SHOWN IN YOUR DETAILED PROCESS FLOW DIAGRAM) FOR ALL AIR POLLUTANTS LISTED ABOVE INCLUDING INDIVIDUAL HAP'S (LISTED IN SECTION 112[b] OF THE 1990 CAAA), TAP'S (LISTED IN 45CSR27), AND OTHER AIR POLLUTANTS (E.G. POLLUTANTS LISTED IN TABLE 45-13A OF 45CSR13, MINERAL ACIDS PER 45CSR7, ETC.).

14. CERTIFICATION OF DATA

I, JAY VALVO (TYPE NAME) ATTEST THAT ALL THE REPRESENTATIONS CONTAINED IN THIS APPLICATION, OR APPENDED HERETO, ARE TRUE, ACCURATE, AND COMPLETE TO THE BEST OF MY KNOWLEDGE BASED ON INFORMATION AND BELIEF AFTER REASONABLE INQUIRY, AND THAT I AM A RESPONSIBLE OFFICIAL** (PRESIDENT, VICE PRESIDENT, SECRETARY OR TREASURER, GENERAL PARTNER OR SOLE PROPRIETOR) OF THE APPLICANT.

SIGNATURE OF RESPONSIBLE OFFICIAL: _____



TITLE: PLANT MANAGER

DATE: 10 / 13 / 15

** THE DEFINITION OF THE PHRASE 'RESPONSIBLE OFFICIAL' CAN BE FOUND AT 45CSR13, SECTION 2.23.

NOTE: PLEASE CHECK ENCLOSED ATTACHMENTS:

ATTACHMENT A ATTACHMENT B ATTACHMENT C ATTACHMENT D ATTACHMENT E

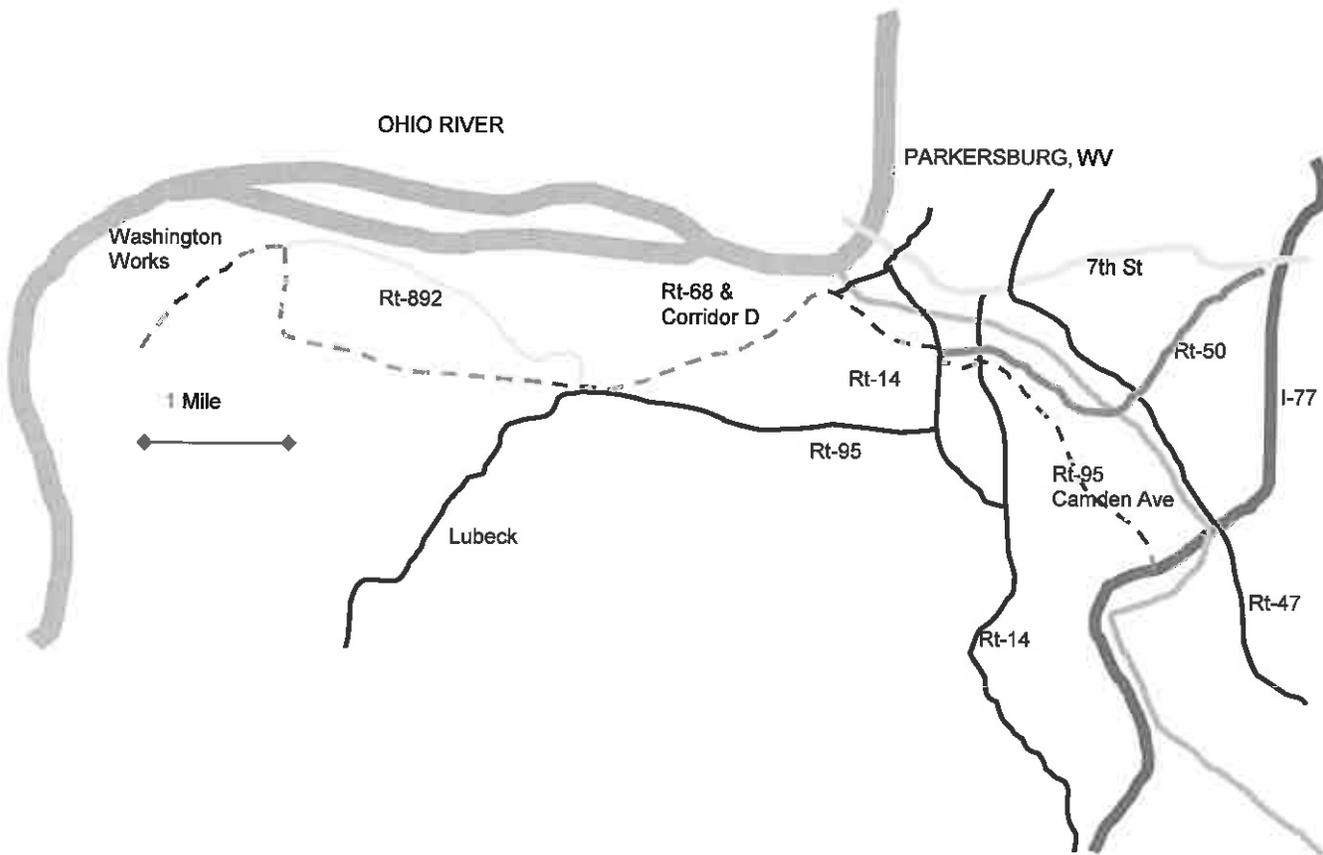
RECORDS ON ALL CHANGES ARE REQUIRED TO BE KEPT AND MAINTAINED ON-SITE FOR TWO (2) YEARS.

THE PERMIT DETERMINATION FORM WITH THE INSTRUCTIONS CAN BE FOUND ON DAQ'S PERMITTING SECTION WEB SITE:

www.dep.wv.gov/daq

ATTACHMENT A

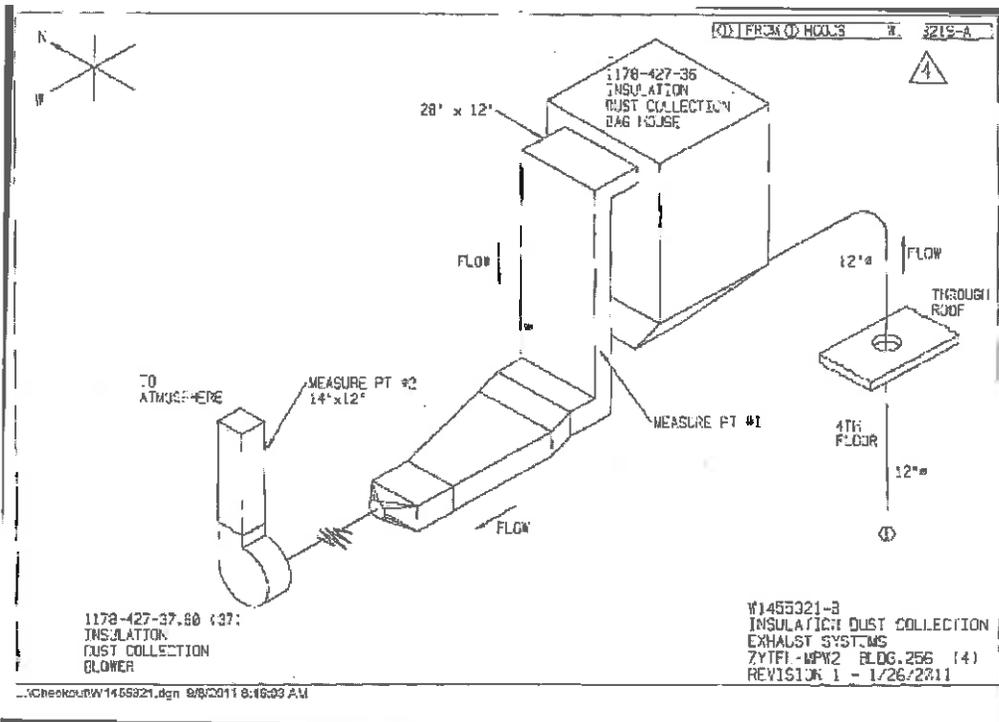
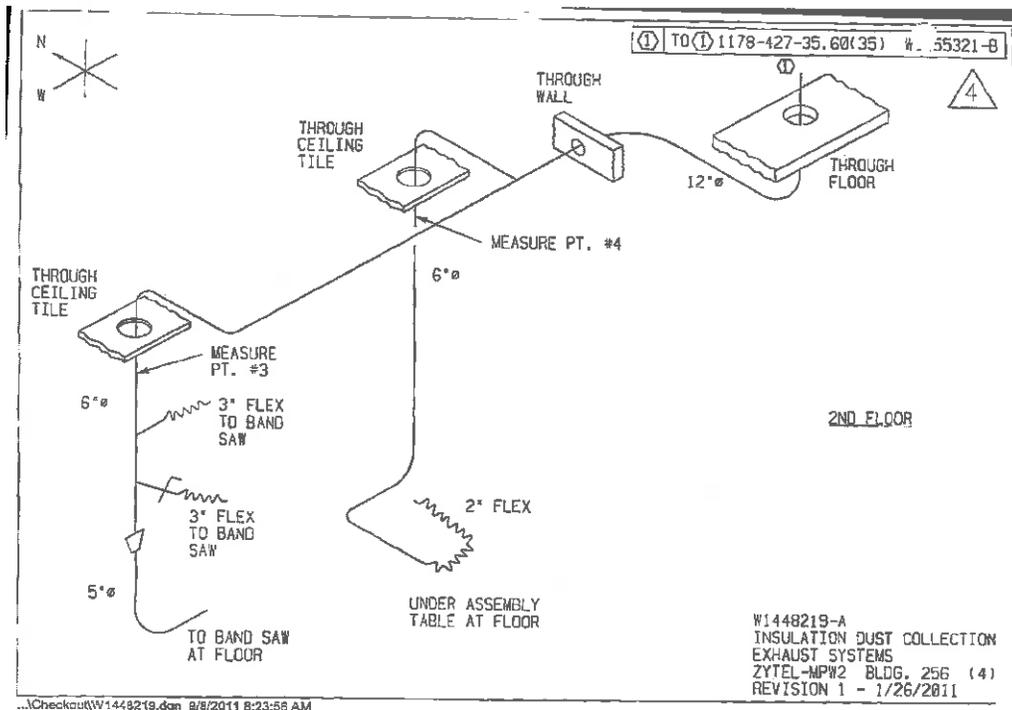
MAP to the Facility



From Interstate 77, take exit for Rt-95/Camden Avenue.
Proceed West until intersection with Rt-14 then turn right (north).
After about 1/4 mile turn left onto Corridor D Bypass entrance.
Follow the bypass to the exit just before the bridge.
Turn left (south) onto DuPont Rd, Rt-892.
Proceed approx. 1 mile to facility on right.

ATTACHMENT B

Process Flow Diagram Vent Diagram



ATTACHMENT C

Process/Project Description

Description of de minimis Maintenance Activities

The Insulation Dust Collection System described in the drawings in Attachment B was previously described on permit R30-10700001-2015 Segment 12 of 14 (Facilities, Construction & Support) as units VZIS01 bandsaw, VZIS02 assembly table, and VZIS03 assembly table. (The drawing only describes one of the tables.) The three sources were and remain located in Building 256 which is the location of the Zytel® MPW-2 continuous nylon resin production process.

VZIS01E (inside vent)	VZIS01C Dust Collection System - Drum Mounted Filter Unit	VZIS02	Exhaust Table	4' x 6"	1979
		VZIS03	Exhaust Table	4' x 6"	1979
VTIS01E	VTIS01C Dust Collection System - Cabinet Filter System	VTIS01	Band Saw - Insulation	15"	1991

In support of the July 1, 2015 separation of Chemours from DuPont, the Segment 12 of 14 permit was transferred to Chemours. A subsequent review identified that the 'VZIS' sources belong to DuPont rather than to Chemours. So, Chemours representatives requested that the sources should be removed from the permit for Segment 12 of 14 and suggested that they be added to R30-10700001-2011 Segment 5 of 14, which covers the Zytel® nylon resins production.

In a review prior to our requesting this change we identified that the devices are used only for maintenance activities to support the upkeep of insulation for the MPW-2 unit. They are not production units. Because of the intermittent and infrequent use of the devices it is not possible to provide a reasonably accurate emission estimate. As such, we believe the three devices meet the definition of "de minimis source" in 45 CSR13 section 2.6 and are appropriately described in Item 40 of Table 45-13B as "Commercial and residential maintenance and upkeep activities occurring at a building, residence or other structure..." Further, for Title V permitting purposes, we believe the devices meet the definition of "insignificant activities" in the exemption section of WV Rule 30.

3.2.d.6. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.

If the devices are insignificant, then the sources VZIS01, VZIS02, and VZIS03 and their emission point VZIS01E can be removed from the Chemours permit (Segment 12 of 14) and would not be added to the Zytel® permit, Segment 5 of 14. Accordingly, the sources should be removed from applicability lists and tables in the following requirements in the 12 of 14 permit:

4.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. These provisions shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any

period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. (*VP005E, VCMDCS34E, ~~VZIS01E~~, VTISO1E, VCSO1E, and VTEMPWORK*) [45CSR§§7-3.1. and 3.2]

4.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A of 45CSR7.

Emission Points	45CSR7 Hourly Particulate Emission Limit pph
VP005E	0.8
VCMDCS34E	0.736
VZIS01E	0.736
VTISO1E	0.736
VCS01E	0.435

(*VP005E, VCMDCS34E, ~~VZIS01E~~, VTISO1E, VCSO1E*) [45CSR§7-4.1]

4.2.2. The following work practices shall be employed for VP005E, VCMDCS34E, ~~VZIS01E~~, and VTISO1E to minimize the potential of fugitive particulate matter and demonstrate compliance with the opacity limits of 4.1.1 and the hourly emission limits of 4.1.2.

1. Pre-Operation Checks

- a. Ensure integrity of flexible fittings.
- b. Operate Filter Shaker.
- c. Ensure that filters are engaged.
- d. Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.

2. Post-Operation Checks

- a. Check area around collector/recovery device for indications of leaks.
- b. If leaks are noted, the sources of those will be repaired prior to the next use of the unit and any free particulate will be swept up and contained for proper disposal.

(*VP005E, VCMDCS34E, ~~VZIS01E~~, and VTISO1E*) [45CSR§30-5.1.c.]