Memo to File

To: Bev McKeone

From: Mike Egnor

Date: October 20, 2015

Re: PD 15-087 • DuPont • Washington Works • 107-00001

This office received a permit determination request from DuPont October 15, 2015 and dated October 14, 2015. When the facility was split between DuPont and Chemours, Chemours determined that a Zytel Building Insulation Saw was contained in one of their Title V Permits (Part 12 of 14) although this piece of equipment remained with DuPont. The determination request first acknowledges the ownership of the VZIS01C Dust Collection System – Drum Mounted Filter Unit with Exhaust Tables VZIS02 and VZIS03 as well as Emission Unit VTIS01C Dust Collection System – Cabinet Filter System which includes VTIS01 Band Saw Insulation. The Permit Determination request is to designate these sources as "de minimis sources" and not be required to be included in a Rule 13 Permit.

The purpose of the Zytel Building Insulation Saw is to cut insulation which is then used throughout the facility for insulation. Item 39 under the 45CSR13 Table 45-13B de minimis source list states "On-site plant maintenance and upkeep activities, including…installing insulation…provided that these activities are not conducted as part of a manufacturing process…"

Since the equipment is used to cut insulation for use in the facility and is not part of a manufacturing process, no permit is needed for this equipment.

Evaluation Comments:

From an EPA letter dated October 6, 1997 which approved the "insignificant activities" under Title V, this equipment would be considered insignificant due to item 32 which includes "Plant maintenance and upkeep activities (e.g.…installing insulation…provided these activities are not conducted as part of a manufacturing process…". Therefore they will not need to add this equipment to their R30-10700001-2011 Part 5 of 14 Title V Permit.