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Evaluation Memo

Application Number: R13-0815J
Facility ID Number: 107-00182
Name of Applicant: The Chemours Company FC, LLC
Name of Facility: Washington Works
Application Type: Class I Administrative Update
Received Date: August 26, 2015
Complete Date: August 27, 2015
Due Date: October 26, 2015
Permit Writer: Mike Egnor

Overview:

This Class I Administrative update application is the result of the removal of conditions regarding Ammonium Perfluorooctanate (APFO), as well as the addition of a requirement that the Permittee not manufacture, use or purchase the material.

Process Description and Proposed Changes:

Teflon® T6 area produces TFE based homopolymers in four agitated batch reactors. The reaction takes place in an aqueous medium, and a white raw polymer dispersion in water is produced. A portion of the raw dispersion production is dried and sold as powder, and a portion is processed and sold as a finished aqueous dispersion.

A batch is started by adding water and other ingredients to the reactor. The major raw material, Tetrafluoroethylene, is fed to the reactors from high-pressure weigh tanks. Polymerization takes place in the aqueous phase at high temperature and pressure. At the end of each batch, most of the unreacted material is recycled to the monomers area for reuse, but a small portion is vented to the atmosphere.

The dispersion product is made by partially concentrating the reactor output in a water/solids separation vessel where some of the water is removed. For product sold as fine powder, the raw dispersion from the reactors is dried (three dryers) at high temperature. The dried product is cooled and packaged.

The changes submitted in this Class I Administrative update R13-0815J include:

1. Remove the reference to APFO from Table A.4 under “type of liquor”. Change the type of liquor to read “Buffered water”.
2. Remove the references to APFO from Table A.5 for emission points T6PME, T6IGE, T6I2CE, T6IVE, T6IEE, T6IFE, T6IXE and T6IYE. There will be no claimed change in claimed particulate emissions.
3. Remove the foot note defining APFO from Table A.5.
4. Remove the entire listed requirement for A.6 and replace with the requirement – “The Permittee shall not purchase, manufacture, store, or use Ammonium perfluorooctanoate (APFO) within the Chemours' Washington Works Facility.”
5. Remove the total requirement found in A.7 and replace with “Reserved”. Requirement A.7 deals only with what is included in APFO modeling requirements for the T6 area and is not applicable to other uses in the compliance with the permit conditions.
6. Remove the paragraphs of Requirement B.5 that contain references to APFO. These are the first four (4) paragraphs of the requirement. These may be eliminated as APFO is no longer present in the process. The requirement for data records may stay as Requirement B.5 as it applies in general to all records taken and requested by the Director or their representative. The requirement for data records has been reworded to include any records required by this Permit.
7. Miscellaneous changes to update the Permit to R13-0815J, including the revision of condition C.3.

Emissions:

By no longer using Ammonia Perfluorooctanoate (APFO), there will be a reduction of 1.49 lbs/hr and 0.34 TPY of APFO.

Recommendation:

The writer recommends that the Class I Administrative Update Permit R13-0815J be granted to Chemours, Washington Works facility located in Wood County, WV. Based on the information provided in the permit application, the applicant meets all applicable federal and state air regulations pertaining to the requested change.