



west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Phone: 304/926-0475 • Fax: 304/926-0479

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

Evaluation Memo

Application Number: R13-1353H

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:

The T5 area produces fluoropolymer resin. The basic processes used are polymerization, drying, and modification. The resin is produced by water based emulsion polymerization in one of two reactor units. Water, monomer (primarily tetrafluoroethylene), process aids, and other minor ingredients are introduced to the reactor. The reaction starts under elevated pressure, but proceeds to an endpoint

at sub-ambient pressure. The resin is removed as slurry and is stored in one of several tanks pending further treatment and drying.

The polymer slurry is processed and dried. The wet polymer passes through one of two dryers. Emissions from either dryer pass through cyclone separators to recover particulate matter. Both cyclone systems employ a water spray to improve effectiveness. The material recovered from the cyclones is returned to the process. Dried resin is transferred to a pack-out room where it is drummed using automated equipment.

Line #2 contains an additional processing step. The added material used in this process is not VOC, nor is it an ozone-depleting compound. This material is recovered within the system. The treated polymer is then dried using the Line #2 dryer.

The changes submitted in this Class I Administrative update R13-1353H include:

1. Remove the emission limits for APFO from Table A.1 for emission points T5HGE and T5HIE as well as footnote 1.
2. Remove the entire listed APFO requirement for Condition A.7 and replaced the requirement with “The Permittee shall not purchase, manufacture, store, or use Ammonium perfluorooctanoate (APFO) within the Chemours' Washington Works Facility.”
3. Remove the APFO modeling requirement found in Condition A.8 and replace with “Reserved”.
4. Remove the words “and APFO” from the process control interlocks and log requirements found in Condition B.6.
5. Remove the emission limit requirement and modeling for APFO found in Condition B.9 and replace with “Reserved”.
6. Miscellaneous changes to update the Permit to R13-1353H, including the revision of Condition C.3.

Emissions:

By no longer using Ammonia Perfluorooctanate (APFO), there will be a reduction of 0.05 lbs/hr and 0.07 TPY of APFO.

Recommendation:

The writer recommends that the Class I Administrative Update Permit R13-1353H 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.