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**west virginia department of environmental protection**

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## **Evaluation Memo**

**Application Number:** R13-195J  
**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

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### **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 C2 Area manufactures fluoropolymer resins by pre-charging fluoromonomers into reactors along with demineralized water. Aqueous solutions of catalyst salts are then pumped into the reactors to initiate polymerization. Additional fluoromonomers are fed into the reactors as the reaction proceeds. Unreacted fluoromonomers are vented to recycling facilities at the end of the reaction.

The remaining fluoropolymer and water slurry is pumped to agglomerators that mechanically separate the fluoropolymer from the water. Alternatively, the reactor output may be sent to facilities which concentrate the dispersion to higher solids and package the dispersion for sale. From the agglomerators, the polymer is conveyed to devices where water and other low boiling compounds are removed prior to extrusion. The polymer is then converted to pellets via an extrusion process. The pellets are hot air sparged to remove additional traces of miscellaneous volatile fluorocarbons, elutriated to remove traces of polymer fines and packaged for distribution.

**The changes submitted in this Class I Administrative update R13-1953J include:**

1. Removed the limitations of APFO from Condition 4.1.5 and replace the language with "The Permittee shall not purchase, manufacture, store, or use Ammonium Perfluorooctanoate (APFO) within the Chemours' Washington Works Facility.
2. Removed the APFO concentration limit, modeling requirement, and emission point parameters given in Conditions 4.1.6, 4.1.7, and 4.1.8 and replace the language with "Reserved".
3. Removed the footnote defining APFO from Condition 4.2.1. that excluded APFO from the control efficiency of particulate matter from the listed emission sources.
4. Removed the APFO column from the monthly emissions recordkeeping from Appendix A Attachment B.
5. Removed the APFO from the annual emissions recordkeeping for emission units source C2DTE from Appendix A Attachment C. The other pollutants that require annual emissions recordkeeping remain in this Attachment for emission units source C2DTE.
6. Miscellaneous changes to update the Permit to R13-1953J, including the revision of Condition 2.4.1, 2.5.1, and throughout Appendix A.

**Emissions:**

By no longer using Ammonia Perfluorooctanate (APFO), there will be a reduction of 0.45 lbs/hr and 0.98 TPY of APFO.

**Recommendation:**

The writer recommends that the Class I Administrative Update Permit R13-1953J 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.