



west virginia department of environmental protection

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**MEMORANDUM**

**To:** Beverly McKeone, NSR Program Manager  
**From:** Mike Egnor, Engineer  
**Date:** September 16, 2015  
**Subject:** Class I Administrative Update R13-2654D for Chemours Washington Works

On September 2, 2015, Chemours Washington Works submitted an application for a Class I administrative update, R13-2654D, to transfer equipment (see 1) below) and Permit requirements from R13-2692A to R13-2654D in order to retire R13-2692A. Section 4.0 of R13-2692A had emission limits and other requirements for units during periods designated as commercial production. These units no longer are used for commercial production and are now only research and development. As a result, those requirements no longer apply. There will be a reduction in overall permitted emissions at this Facility as a result of this modification. As a result, the following changes were made:

- 1) **Changes to the Emission Units Table in Section 1.0.** The Emission Units Table has been updated to include the following Emission Sources from R13-2692A:

Emission Source ID	Emission Point ID	Emission Source Description	Year Installed	Control Device
R022S200	R022EPVJ	HFP System Evac	1989	None
R022S204	R022ECPV	FP SW O2 Analyzers	1978	None
R022S205A	R022ECPV	FP SW TFE Tank #1 Vent	2004	None
R022S205B	R022EPVJ	FP SW TFE Tank #1 Evac	2004	None
R022S206A	R022ECPV	FP SW TFE Tank #2 Vent	1994	None
R022S206B	R022EPVJ	FP SW TFE Tank #2 Evac	1994	None
R022S207A	R022ECPV	FP SW TFE Tank #3 Vent	1985	None
R022S207B	R022EPVJ	FP SW TFE Tank #3 Evac	1985	None
R022S208A	R022EEF9	FP SW Aq Feeds Vent	1980-2000	None
R022S208B	R022EPVJ	SW Aq Feeds Evac	1980-2000	None

R022S209A	R022EEF12	SW Nonaq Feeds Vent	1980-2000	None
R022S209B	R022EPVJ	SW Nonaq Feeds Evac	1980-2000	None
R022S210A	R022EPK1	Reactor #1 Vent	1969	None
R022S210B	R022EPVJ	Reactor #1 Evac	1969	None
R022S211A	R022EPK2	Reactor #2 Vent	1988	None
R022S211B	R022EPVJ	Reactor #2 Evac	1988	None
R022S212A	R022EPK3	Reactor #3 Vent	1994	None
R022S212B	R022EPVJ	Reactor #3 Evac	1994	None
R022S213A	R022ECPV	Reactor #4 Mixed Feed Vent	1974	None
R022S213B	R022EEF7	Reactor #4 Rxn Vent	1974	None
R022S214A	R022EPK5	Reactor #5 Vent	1985	None
R022S214B	R022EPVJ	Reactor #5 Evac	1985	None
R022S215	R022EEF89	#1 Oven	1992	None
R022S232A	R022EEF89	Mixer Vent	1985	None
R022S232B	R022EEVJ	Mixer Evac	1985	None
R022S233A	R022EEF6	Drying Ovens	1965-1995	None
R022S233B	R022EEF89	Drying Ovens	1964	None
R022S234	R022EEF6	Hydraulic Presses Hood	1964-1992	None
R022S235	R022EEF6	Mixer	1996	None
R022S236	R022EEF6	#2 Oven	1973	None
R022S237	R022EEF11	Fume Hood	1964	None
R022S238	R022EEF146	Melt Indexers/Oven	1964	None
R022S239	R022EEF86	Small Extruder	1974	None
R022S240A	R022EEF87	Large Extruder	1976	None
R022S240B	R022EEF89	Large Extruder	1976	None
R022S240C	R022EEF85	Feed Hopper	1976	None
R022S242	R022EEF16	Coolant System #1	1988	None
R022S243	R022EEF14	Coolant System #2	1996	None
R022S244	R022EEF7	Coolant System #3	1985	None
R022S245	R022EEF176	Drum Storage	1964	None
R022S246	R022EEF176	Coolant Storage	1964	None
R022S247	R022ECPV	Monomer Transfer Line	2002	None
R029S230	R029EEF130	Double Cone Fluorinator	1985	R029C229
R029S231	R029EEF130	Vibrating Bed Fluorinator	1987	R029C229
22-S-109	22-E-109	Research Laboratory Hood	1970	None
22-S-202	22-E-202	Research Laboratory Hood	1970	None
22-S-208	22-S-208	Research Laboratory Hood	1970	None
22-S-209	22-S-209	Research Laboratory Hood	1970	None

**2) Transfer of Section 5.0 of R13-2692A to Section 4.0 of R13-2654D.**

The four laboratory hoods 22-S-109, 22-S-202, 22-S-208, and 22-S-209 are no longer used for commercial production. As such, Condition 5.1.1 from R13-2692A has been revised to remove references to commercial production. Condition 5.3.1 from R13-2692A no longer applies. The laboratory hoods still have Rule 27 requirements which are not exempted from research and development activities. The remaining requirements of Section 5.0 of R13-2692A have been transferred to Section 4.0 of R13-2654D (previously reserved) as follows:

**4.0. Source-Specific Requirements – Laboratory Hoods 22-S-109, 22-S-202, 22-S-208, and 22-S-209**

**4.1. Limitations and Standards**

- 4.1.1. Except as provided by Sections 4.1.2 and 4.1.3 below, the laboratory hoods 22-S-109, 22-S-202, 22-S-208, and 22-S-209 shall be operated in accordance with the requirements and limitations found in 45CSR13A and 45CSR13B.
- 4.1.2. Emissions of Methylene chloride for the four laboratory hoods 22-S-109, 22-S-202, 22-S-208, 22-S-209 shall not exceed 0.01 lbs/hr or 0.03 TPY for all hoods combined.
- 4.1.3. The permitted facility shall comply with all applicable requirements of 45CSR27 – “To Prevent and Control the Emissions of Toxic Air Pollutants.” The facility shall limit total emissions of regulated pollutant from each specific emission point in Section 4.1.2 of this permit to the maximum hourly and annual limits set in Section 4.1.2. These requirements replace and supercede the methylene chloride limiting requirements pertaining to equipment covered by this permit found in the most current version of R13-3223. [45CSR27]

**4.2. Monitoring Requirements**

N/A

**4.3. Testing Requirements**

N/A

**4.4. Recordkeeping Requirements**

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
  - a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of the analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.
- 4.4.2. To demonstrate compliance with emission limits in Section 4.1.2 of this permit, the permittee shall maintain records of the maximum hourly production rate of each day. These records shall be

maintained according to the conditions specified in 40 CFR 63.10(b)(1). Such records shall be certified by a (Responsible Official) and made available to the Director or his duly authorized representative upon request.

4.4.3. To demonstrate compliance with the emission limits of Section 4.1.2 of this permit, the permittee shall maintain monthly records of the total annual production of each product. Annual production rates shall be based on a 12-month rolling total. These records shall be maintained according to the conditions specified in 40 CFR 63.10(b)(1).

4.4.4. To demonstrate compliance with the emission limits associated with the "Research Lab Hoods", identified in Section 4.1.2 of this permit, the research facilities shall maintain a monthly record of the specific pollutant regulated and consumed by the hoods. This monthly consumption record will also be included in an annual consumption report for the Research Lab Hoods. This report shall document the amount of the chemicals regulated under 45 CSR 27 and processed through the Research Lab Hoods under the control of Research personnel. The affected sources shall include the following: 22-S-109, 22-S-202, 22-S-208, and 22-S-209.

**4.5. Reporting Requirements**

4.5.1. *[Reserved]*

**3) Transfer of Equipment listed in R13-2692A to Section 6.0 of R13-2654D.**

Section 4.0 of R13-2692A previously contained emission limits and other requirements for equipment during commercial production. These units will no longer be used for commercial production and are only used for research and development. All of the units in R13-2654D are subject to the limits and requirements set forth in 45CSR13A and/or 45CSR13B, which are for research and development (R&D) and laboratory activities. The units from Section 4.0 of R13-2692A have been added to Table 6.1.1. The revised table is shown below:

**Table 6.1.1.**

Source IDs		
R022S002	R022S012	R022SB20
R022S003	R022S047	R022SB28
R022S007	R022SB05	R022SB36
R022S008	R022SB06	R022SB38
R022S009	R022SB17	R022SB40
R022S011	R0SSSB19	<u>R022S238</u>
<u>R022S204</u>	<u>R022S212A</u>	<u>R022S239</u>
<u>R022S205A</u>	<u>R022S212B</u>	<u>R022S200</u>
<u>R022S205B</u>	<u>R022S213A</u>	<u>R022S240A</u>
<u>R022S206A</u>	<u>R022S213B</u>	<u>R022S240B</u>
<u>R022S206B</u>	<u>R022S214A</u>	<u>R022S240C</u>
<u>R022S207A</u>	<u>R022S214B</u>	<u>R022S242</u>
<u>R022S207B</u>	<u>R022S215</u>	<u>R022S243</u>
<u>R022S208A</u>	<u>R022S232A</u>	<u>R022S244</u>

<u>R022S208B</u>	<u>R022S232B</u>	<u>R022S245</u>
<u>R022S209A</u>	<u>R022S233A</u>	<u>R022S246</u>
<u>R022S209B</u>	<u>R022S233B</u>	<u>R022S247</u>
<u>R022S210A</u>	<u>R022S234</u>	<u>R029S230</u>
<u>R022S210B</u>	<u>R022S235</u>	<u>R029S231</u>
<u>R022S211A</u>	<u>R022S236</u>	
<u>R022S211B</u>	<u>R022S237</u>	

4) **Miscellaneous**

There have been various updates to the permit as a result of this modification, including updating the Table of Contents, Condition 2.5.1 to include R13-2654D, the Permittee Name to "The Chemours Company FC, LLC", Permittee Number to "10700182" as well updating the Permit to the current version R13-2654D. The second sentence in Condition 6.1.1 has been corrected from "Operations shall be limits to research..." to "Operations shall be limited to research..."

The reduction of permitted emissions is summarized below:

Pollutant	lbs/hr	TPY
ODC	6.2	1.9
Total HAPs	4.38	4.39
VOC	359.4	30.6
APFO	< 0.01	< 0.01
CO	0.5	0.5
PM <sub>10</sub>	0.6	0.6
Fluorides	0.02	0.01

The changes requested in this permit application are a transfer of requirements in NSR Permits and meet the definition of a Class I Administrative Update according to the definition provided in 45CSR13-4.2.a.

**Recommendation:**

The writer recommends that Class I Administrative Update Permit R13-2654D 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 regulations pertaining to the requested change.

*Mike Egnor*  
 Mike Egnor  
 Permit Engineer

*9/16/2015*

Date