

# Fact Sheet



## *For Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act*

Permit Number: **R30-10700001-2003**

Plant Identification Number: **10700001**

Permittee: **E. I. duPont de Nemours & Company, Inc.**

Facility Name: **Washington Works**

Business Unit: **Facilities, Construction, and Support (FC&S) (Part 12 of 14)**

Mailing Address: **P.O. Box 1217, Washington, WV 26181-1217**

*Permit Action Number: MM02 Revised: May 31, 2005*

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Physical Location: Washington, Wood County, West Virginia  
UTM Coordinates: 442.368 km Easting • 4,346.679 km Northing • Zone 17  
Directions: Route 68 west from Parkersburg to intersection of Route 862. Continue west on Route 862 with the plant being on the north side about one mile from the intersection of Routes 68 and 862.

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### **Facility Description**

Facilities, Construction, and Support (FC&S) performs operations such as welding, painting, insulation fabrication and installation, and vehicle refueling in support of specific projects and specific maintenance requirements for other business units at the site. Included in this group are contracted services that are brought on-site for specialized activities of short duration, such as large component cleaning, sandblasting and painting.

Minor Modification submitted and received by WVDAQ on April 1, 2005. Request involves the installation of an insulation saw with an associated dust collection system (drum filter system) for use by the FC& S personnel in the improvement and maintenance activities. Requested changes to the Title V Permit R30-10700001-2003 for Facilities, Construction, and Support (FC&S) (Part 12 of 14) include the following:

| Page Numbers | Requested Change  |
|--------------|---|
| 7            | Added emission point ID VMIS01E and emission source information into the table. |
| 25           | Added reference for VMIS01E to condition 4.1.3.                                 |
| 26           | Added reference for VMIS01E to condition 4.1.4.                                 |
| All Pages    | Update in permit action number and revised date.                                |

## Emissions Summary

The installation of the saw and associated control equipment was determined not to require a permit under Permit Determination PD-05-001 issued by WVDAQ on 03/08/05. The installation is designed to discharge the control (filter) system within the building. Therefore, this modification is exempt from the particulate emissions limitation in 45CSR7, and there is no regulatory increase in potential emissions.

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants (CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, and VOC), over 10 tons per year of a single Hazardous Air Pollutant (HAP), and over 25 tons per year of aggregated Hazardous Air Pollutants (HAPs). Due to this facility's potential to emit over 100 tons per year of criteria pollutants (CO, NO<sub>x</sub>, PM, SO<sub>2</sub>, and VOC), over 10 tons per year of a single Hazardous Air Pollutant (HAP), and over 25 tons per year of aggregated Hazardous Air Pollutants (HAPs), DuPont Washington Works is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

|                    |         |   |
|--------------------|---------|---|
| Federal and State: | 45CSR7  | Control of particulate matter from manufacturing source operations. |
|                    | 45CSR30 | Operating permit requirement.                                       |

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

| Permit or Consent Order Number | Date of Issuance | Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> ) |
|--------------------------------|------------------|--|
| N/A                            | N/A              | N/A  |

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## Determinations and Justifications

The installation of the insulation saw and associated dust collection system is considered a maintenance activity as it has no other function than use "in service" to the Washington Works facilities. As such, it is exempt from 45CSR§7-4.1. under the exemption found in 45CSR§7-10.3. The use of the filter and

vacuum, along with the discharge inside a building with the associated housekeeping practices and standards, constitute “good engineering practices” as required by 45CSR§7-10.3.

### **Non-Applicability Determinations**

The following requirements have previously been determined not to be applicable to the subject facility due to the following:

- a. 40 C.F.R. 60, Subpart K - “Standards of Performance For Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.” There were no petroleum liquid storage tanks constructed in Facilities, Construction, and Support during these dates.
- b. 40 C.F.R. 60, Subpart Ka - “Standards of Performance for Storage Vessels For Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984.” There are no petroleum liquid storage tanks constructed in Facilities, Construction, and Support during these dates with a capacity greater than 40,000 gallons.
- c. 40 C.F.R. 60, Subpart Kb - “Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.” There are no volatile organic liquid storage tanks constructed in Facilities, Construction, and Support after the effective date with a design capacity greater than 75 m<sup>3</sup> (19,812.9 gallons).
- d. 40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.” Facilities, Construction, and Support does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.
- e. 40 C.F.R. 60, Subpart DDD - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.” Facilities, Construction, and Support does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
- f. 40 C.F.R. 60, Subpart RRR - “Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes. Facilities, Construction, and Support does not produce any of the chemicals listed in 40 C.F.R. §60.707 as a product, co-product, by-product, or intermediate.
- g. 40 C.F.R. 61, Subpart V - “National Emission Standards for Equipment Leaks (Fugitive Emissions Sources).” Applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in Facilities, Construction, and Support.
- h. 40 C.F.R. 63, Subpart H - “National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.” 40 C.F.R. 63 Subparts F, G, and H do not apply to Facilities, Construction and Support manufacturing process units, as they do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- i. 40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins. Facilities, Construction, and Support does not produce the materials listed in 40 C.F.R. §63.1310.
- j. 40 C.F.R.63, Subpart FFFF – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.” Facilities, Construction, and Support does not manufacture any material or family of materials defined in §63.2435(b)(1)(i) through (v).

- k. 40 C.F.R. 63, Subpart WWWW “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Productions.” Facilities, Construction, and Support does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.
- l. 40 C.F.R. 63, Subpart PPPP – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products.” Facilities, Construction, and Support does not produce an intermediate or final product that meets the definition of “surface coated” plastic part.
- m. 40 C.F.R. 63, Subpart IIII – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks.” Facilities, Construction, and Support does not engage in the surface coating of new automobile or light-duty truck bodies or body parts for new automobiles or light-duty trucks.
- n. 40 C.F.R. 63, Subpart MMMM – “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.” There are no surface coating activities conducted in Facilities, Construction, and Support subject to the requirements of this rule.
- o. 40 C.F.R. 63, Subpart HHHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” Facilities, Construction, and Support does not produce, blend, or manufacture coatings as part of the manufacturing process.
- p. 40 C.F.R. 82, Subpart C – “Protection of Stratospheric Ozone.” Bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. Facilities, Construction, and Support does not use, manufacture, nor distribute these materials.
- q. 45CSR27 – “To Prevent and Control the Emission of Toxic Air Pollutants.” Facilities, Construction, and Support does not have emission sources of toxic air pollutants as listed in 45CSR27.
- r. 45CSR§21-19 – “Other Facilities that Emit Volatile Organic Compound (VOC).” The operations of Facilities, Construction, and Support are outside of the SIC grouping to which this section of 45CSR21 applies.
- s. 45CSR§21-40 – “Other Facilities that Emit Volatile Organic Compound (VOC).” None of the emission sources in Facilities, Construction, and Support have maximum theoretical emissions of 6 pounds per hour or more and are not subject to the requirements of this section.

**Request for Variances or Alternatives**

None.

**Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

**Comment Period**

All written comments should be addressed to the following individual and office:

Toby Scholl  
Title V Permit Writer  
West Virginia Department of Environmental Protection

Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304

**Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Point of Contact**

Toby Scholl  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone: 304/926-0499 (ext. 1213) • Fax: 304/926-0478

**Response to Comments (Statement of Basis)**

N/A