

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10700001-2009**
Application Received: **February 2, 2009**
Plant Identification Number: **107-00001**
Permittee: **E. I. duPont de Nemours & Company, Inc.**
Facility Name: **Washington Works**
Business Unit: **Central Laboratory Services (Part 13 of 14)**
Mailing Address: **P. O. Box 1217, Washington, WV 26181-1217**

Revised: NA

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 442.27 km Easting • 4,346.57 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.

Facility Description

Central Laboratory Services (Part 13 of 14) is the result of consolidation of laboratory services involved with the final product qualification and testing, intermediate process sample analysis, and raw material qualification. The area also maintains a small facility for environmental testing, principally for water and for OSHA compliance monitoring.

DuPont Washington Works has divided the Title V Permit Application into the following fourteen separate business units for which each has a Title V Permit:

Acrylic Resin Production	Part 1 of 14
Fluoropolymer Production	Part 2 of 14
Acetal Resin Production	Part 3 of 14
Polyvinyl Butyral Production	Part 4 of 14

Nylon Resins Production	Part 5 of 14
Engineering Polymers Compounding Production - East	Part 6 of 14
Engineering Polymers Compounding Production - West	Part 7 of 14
Specialty Compounding Production	Part 8 of 14
Filaments Production	Part 9 of 14
Power and Service Support Facilities	Part 10 of 14
Research and Development (R&D)	Part 11 of 14
Facilities, Construction and Support (FC&S)	Part 12 of 14
Central Laboratory Services	Part 13 of 14
Central Maintenance Services	Part 14 of 14

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2007 Actual Emissions
Carbon Monoxide (CO)	0.0645	0.0
Nitrogen Oxides (NO _x)	0.0096	0.0
Particulate Matter (PM ₁₀)	0.98	0.06
Total Particulate Matter (TSP)	0.98	0.06
Volatile Organic Compounds (VOC)	0.541	0.07

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2007 Actual Emissions
Formaldehyde	0.00165	0.0002
HCl	0.05	0.03
Methanol	0.0184	0.006
Methylene Chloride	0.04	0.002
Toluene	0.0414	0.012
Phenol	0.00935	0.003
n-Hexane	0.00035	0.0
m-Cresol	0.00005	0.0
Tetrachloroethylene	0.0002	0.0
Xylene	0.00005	0.0

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

Due to the facility-wide potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year aggregate 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:	45CSR6	Open burning prohibited.
	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction, modification, relocation, etc.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR27	Best Available Technology (BAT) for HAPs

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, 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>)
R13-2617B	September 29, 2006	NA
R13-2654	January 30, 2007	NA

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.

Non-Applicability Determinations

The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

- 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 are no storage tanks in Central Laboratory Services.
- 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 storage tanks in Central Laboratory Services.
- 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 storage tanks in Central Laboratory Services.
- d. 40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.” Central Laboratory Services does not produce as intermediates or final products any of the materials listed in §60.489.
- e. 40 C.F.R. 60, Subpart DDD - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.” Central Laboratory Services 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.” Central Laboratory Services does not produce any of the chemicals listed in §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 §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in Central Laboratory Services.
- 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 manufacturing process units that do not meet the criteria in §§63.100(b)(1), (b)(2), and (b)(3).
- i. 40 C.F.R. 63, Subpart T - “National Emission Standards for Halogenated Solvent Cleaning.” There are no solvent cleaning units in Central Laboratory Services using halogenated solvents as listed in §63.460(a).
- j. 40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.” Central Laboratory Services does not produce the materials listed in §63.1310.
- k. 40 C.F.R. 63, Subpart EEEE - “National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).” Central Laboratory Services does not engage in the activities to distribute organic liquids.

- l. 40 C.F.R.63, Subpart FFFF – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.” Central Laboratory Services does not manufacture any material or family of materials defined in §63.2435(b)(1)(i) through (v).
- m. 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 Central Laboratory Services subject to the requirements of this rule.
- n. 40 C.F.R. 63, Subpart QQQQ - “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products.” The surface coating activities of Central Laboratory Services are excluded from the requirements of the rule because they are non-commercial operations using coatings supplied by non-refillable aerosol containers.
- o. 40 C.F.R. 63, Subpart RRRR - “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.” The surface coating activities of Central Laboratory Services use non-refillable aerosol containers for the purpose of repairing furniture for on-site use and are excluded from the requirements of the rule.
- p. 40 C.F.R. 63, Subpart GGGG – “National Emission Standards for Hazardous Air Pollutants: Site Remediation.” Central Laboratory does not conduct site remediations as defined in §63.7957.
- q. 40 C.F.R. 63, Subpart HHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” Central Laboratory Services does not manufacture coatings as defined in §63.8105.
- r. 40 C.F.R. 63, Subpart NNNN – “National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production.” Central Laboratory Services does not produce a liquid HCl product.
- s. 40 C.F.R. 82, Subpart B - “Protection of Stratospheric Ozone.” Requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing equipment need to be licensed. Central Laboratory Services does not conduct motor vehicle maintenance involving CFCs on site.

Request for Variances or Alternatives

None

Insignificant Activities

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

Comment Period

Beginning Date: April 9, 2009
Ending Date: May 26, 2009

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

Rex Compston
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th 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

Rex Compston
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.