

West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet



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

Permit Number: **R30-10700001-2003**
Application Received: **February 6, 2008**
Plant Identification Number: **03-54-10700001**
Permittee: **E. I. du Pont de Nemours & Company, Inc.**
Facility Name: **Washington Works**
Business Unit: **Central Maintenance Services (Part 14 of 14)**
Mailing Address: **P.O. Box 1217, Parkersburg, WV 26102-1217**

Physical Location: Parkersburg, Wood County, West Virginia
UTM Coordinates: 442.368 km Easting • 4,346.679 km Northing • Zone 17
Directions: From Charleston take Interstate 77 (I-77) to Exit 176. From the exit ramp, turn left on US Route 50 bypass and go towards the Athens Ohio Exit. Follow US Route 50 bypass to the DuPont Road, Route 892. This is the last exit before the bridge over the Ohio River. At the stop light at the bottom of the exit ramp, turn left. The plant will be easily visible on the right. The plant is about half mile from the exit ramp.

Facility Description

DuPont Washington Works is a multiple business, multiple product line facility that produces plastic resins and their associated feedstock materials. Central Maintenance Services is a segment of Washington Works that supports other operations on site by providing specific maintenance services to other business and product lines. Central Maintenance Services does not manufacture any product as defined by a SIC or NAICS code classification and thus uses the SIC code 2821 and NAICS Code 325211 for the entire facility. The maintenance facilities perform mechanical support activities that encompass, but are not restricted to, instrument calibration, relief valve repair, incidental painting, machining, assembly, disassembly, light sheet metal fabrication and repair, light carpentry for internal use, piping fabrication, welding, parts cleaning, and mechanical quality control functions.

DuPont Washington Works has divided the Title V Permit Application into the fourteen separate business units. This permit covers Business Unit 14 of 14: Central Maintenance Services.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2006 Actual Emissions
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO _x)	0	0
Particulate Matter (PM _{2.5})	0	0
Particulate Matter (PM ₁₀)	4.07	0.01
Total Particulate Matter (TSP)	4.07	0.11
Sulfur Dioxide (SO ₂)	0	0
Volatile Organic Compounds (VOC)	16.97	0.90
Ozone Depleting Compounds (ODC)	N/A ¹	4.88 (from operation of 40CFR82 program)
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2006 Actual Emissions
Toluene	0.05	0
Ethylbenzene	0.18	0.06
Xylene	0.82	0.25
Methyl Isobutyl Ketone	0.13	0.06
Naphthalene	0.5	0
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

¹ODC emissions include Class I and Class II ODC's associated with site-wide refrigeration maintenance performed under the requirements of 40 CFR 82. Because this a work practice program there is no corresponding hourly emission. Central Maintenance Services coordinates all activities of the site to comply with the requirements of 40 C.F.R. Part 82 Subpart F.

Title V Program Applicability Basis

This facility has the potential to emit over 100 tons per year of criteria pollutants (CO, NO_x, PM, SO₂, 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:	45CSR6	Open burning prohibited.
	45CSR7	Particulate matter and opacity limits for manufacturing sources
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Pre-construction permit.
	45CSR21, Section 30	Cold and Solvent Metal Cleaning.

WV Code § 22-5-4 (a) (14) 45CSR30 45CSR34 40 C.F.R. Part 61 40 C.F.R. Part 63 Subpart JJ 40 C.F.R. Part 63 Subpart GGGGG 40 C.F.R. Part 82 Subpart F State Only: 45CSR4	The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63 Asbestos inspection and removal National Emission Standards for Wood Furniture Manufacturing Operations National Emission Standards for Hazardous Air Pollutants: Site Remediation Ozone depleting substances No objectionable odors.
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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>)
None		

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 following changes to the August 6, 2003 Title V Permit and Fact Sheet are R30-10700001-2003 (14 of 14) MM01, R30-10700001-2003 (14 of 14) MM02, and R30-10700001-2003 (14 of 14) MM03. These changes are:

1. R30-10700001-2003 (14 of 14) MM01 incorporates the installation of an underwater abrasive cutting unit (M60/1B15A), the relocation of a bead blast unit (M54B15SB2), and the removal of a grinder station (M55/1B15G7).
2. R30-10700001-2003 (14 of 14) MM02 incorporated the removal of emission points M43/1B15G3E and M44/1B15G4E and placing emission units M5/1B15G6 and M54B15SB2 into inactive service with the suspension of the recordkeeping and reporting for both units.

3. R30-10700001-2003 (14 of 14) MM03 incorporated a new paint booth B-15, ID M15/1B15P. The booth is to be used for small projects to be painted using disposable spray cans.

The following equipment has been removed from the Emission Unit table since the Initial Title V Permit was issued:

1. M55/1B15G7 - Grinder removed from service and no longer used. It has been dismantled
2. M43/1B15G3 - Carpenter Shop Vent. Carpenter Shop is closed.
3. M44/1B15G4 - Carpenter Shop Vent. Carpenter Shop is closed.
4. M9/1B27SB2 - Bead Blast unit from B-27. Shut down and removed.
5. M54B15SB2 - Bead Blast unit from B-15. Removed and relocated to an existing position on plant to replace failed identical unit.
6. M23/1B27SB1 - Bead Blast is shutdown and removed from service
7. M3/1B18C2 - Building 18 Parts Cleaner is shutdown and removed by vendor as unneeded equipment.
8. M42/1B15G2 - Wood dust collection system shutdown.
9. M39/1B15G1 - Building 15 grinder is shutdown and removed from service.

The equipment listed in Section 4.0 Heading that have be removed are: Bead Blast Units (M9/1B27SB2 and M54B15SB2), Wood Dust Collection System (M42/1B15G2), and the Lap Room Grinder (M39/1B15G1).

Emission units M9/1B27SB2 and M54B15SB2 were deleted from the listing in Sections 4.2.1 and 4.4.1 since they were removed.

The second paragraphs of Sections 4.3.1 and 4.3.5 in the Initial title V Permit were relocated to Sections 4.5.1 and 4.5.2 in the Renewal Title V Permit. The facility requested that Sections 4.2.3, 4.2.4, 4.4.4, and 4.4.5 be included in the lists in Sections 4.5.1 and 4.5.2.

Initial Title V Permit, Sections 4.2.3 and 4.3.4 were removed since the Wood Dust Collection System (M42/1B15G2) was removed.

Record requirement “for a period of no less than five (5) years” was removed from Sections 4.4.1 through 4.4.5 since this requirement is a facility wide requirement, Section 3.4.2.

DuPont requested the addition of the recordkeeping requirements found in the Site Remediation MACT (SRM), 40 C.F.R. Part 63 Subpart GGGGG, to support the 1 Mega gram Site Remediation Activity Exemption, see Section 3.4.6.

Non-Applicability Determinations

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

<p>40 C.F.R. 63 Subpart MMMM</p>	<p>“National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.” The surface coating activities of Central Maintenance Services are excluded from the requirements of the rule because they are conducted as part of janitorial, building, and facility maintenance operations and the coatings used are supplied by non-refillable aerosol containers.</p>
<p>40 C.F.R. 63 Subpart RRRR</p>	<p>“National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.” The surface coating activities of Central Maintenance 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 QQQQ	“National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products.” The surface coating activities of Central Maintenance Services are excluded from the requirements of the rule because they are non-commercial operations using coatings supplied by non-refillable aerosol containers.
40 C.F.R. 63 Subpart T	“National Emission Standards for Halogenated Solvent Cleaning.” The solvent used in the parts cleaners is mineral spirits and is not one of the halogenated solvents listed in §63.460(a).
40 C.F.R. 63 Subpart SSSS	“National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil.” There are no operations of Central Maintenance Services defined as a coil coating line subject to Subpart SSSS
40 C.F.R. 60 Subpart EE	“Standards of Performance for Surface Coating of Metal Furniture.” The surface coating activities of Central Maintenance Services are for the purpose of repairing furniture for on-site use and are excluded from the requirements of the rule.
40 C.F.R. 60 Subpart TT	“Standards of Performance for Metal Coil Surface Coating.” There are no operations of Central Maintenance Services defined as a coil coating line subject to Subpart TT.
45CSR§21-12	“Coil Coating,” 45CSR§21-16 - “Coating of Metal Furniture,” and 45CSR§21-19 - “Coating of Miscellaneous Metal Parts.” The operations of the Central Maintenance Services are outside of the SIC grouping to which these sections of 45CSR21 applies.
45CSR§21-37	“Leaks from Synthetic Organic Chemical, Polymer, and Resin Manufacturing Equipment.” There are no processes or streams present in Central Maintenance Services which meet the applicability criteria of 45CSR§21-37 and must implement a Leak Detection and Repair (LDAR) program.
45CSR§21-40	“Other Facilities that Emit volatile Organic Compound (VOC).” None of the emission sources in Central Maintenance Services have maximum theoretical emissions of 6 lb/hour or more.
40 C.F.R. Part 64	The Central Maintenance Services segment of DuPont’s Washington Works does not have any pollutant specific emissions units (PSEU) at this facility that satisfy all of the applicability criteria requirements of 40 CFR § 64.2 (a), i.e., that: 1) have pre-control regulated pollutant potential emissions (PTE) equal to or greater than the “major” threshold limits to be classified as a major source; 2) are subject to an emission limitation or standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, the Central Maintenance Services segment of DuPont’s Washington Works is not subject to the Compliance Assurance Monitoring (CAM) rule.

Request for Variances or Alternative

None

Insignificant Activities

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

Comment Period

Beginning Date: April 10, 2008
Ending Date: May 12, 2008

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

Wayne Green
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

Wayne Green
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Sections 3.1.1 and 3.1.2 were revised to incorporate the changes of Rule 45CSR6 that becomes effective June 1, 2008.

Section 3.1.1 was changed from “**Open burning**. The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1” to “**Open burning**. The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1”.

Section 3.1.2 was changed from “**Open burning exemptions**. The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible” to “**Open burning exemptions**. The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible”.