

# Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on May 12, 2004.

Permit Number: **R30-10700001-2003**  
Application Received: **May 6, 2008**  
Plant Identification Number: **03-54-10700001**  
Permittee: **E. I. du Pont de Nemours and Company**  
Facility Name: **Washington Works**  
Business Unit: **Fluoropolymer Production (Part 2 of 14)**  
Mailing Address: **P. O. Box 1217, Washington, WV 26181-1217**

Permit Action Number: MM08      Revised: *August 12, 2008*

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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:	From I-77, take the exit for Route 95/Camden Avenue. Proceed west until the intersection with Route 14, then turn right (north). After about ¼ mile, turn left onto Corridor D Bypass entrance. Follow the bypass to the exit just before the bridge. Turn left (south) onto DuPont Road (Route 892). Proceed approximately 1 mile. The facility is on the right.

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### Facility Description

The Fluoropolymer Production Unit (Part 2 of 14) manufactures two monomers and has various homopolymer and copolymer production lines.

This minor modification permit is to incorporate changes from the Class II administrative update R13-2391F, issued June 9, 2008.

### Emissions Summary

Emission rate changes associated with this minor modification are as follows:

Emission Point ID	VOC Emissions R13-2391E		VOC Emissions R13-2391F		VOC Emissions Change	
	pph	tpy	pph	tpy	pph	tpy
C3IPE	0.36	0.28	0.80	0.58	+ 0.44	+ 0.30
C3IQE	0.36	0.28	0.40	0.29	+ 0.04	+ 0.01
<b>Total VOC Emissions Change</b>					<b>+ 0.48</b>	<b>+ 0.31</b>

### 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13 45CSR30	Preconstruction permits for minor sources. Operating permit requirement.
State Only:	45CSR§21-40	Control of VOC Emissions.

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 (if any)
R13-2365D	December 16, 2004	NA
R13-0822A	October 31, 2003	NA
R13-1953G	June 28, 2007	NA
R13-2391F	June 9, 2008	NA
R13-1823H	April 1, 2008	NA
R13-1353C	August 22, 2005	NA
R13-0815F	January 4, 2006	NA
R13-2617C	July 13, 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.

### Determinations and Justifications

This Title V minor modification includes changes approved under R13-2391F. In the Class II administrative update, R13-2391F, DuPont proposed the addition of a new Line 3 product filter C3JA to existing Line 2 emission point C3IPE; the addition of an operating scenario to allow continued use of existing Line 3 filter C3IQ in the event that filter C3JA must be taken out of service for a period of time; and an increase in the hourly and annual emission limits for emission points C3IPE and C3IQE in the event that both Line 3 filters C3JA and C3IQ are operated in parallel at maximum capacity for a full year.

The following is a listing of the proposed changes to the Title V Permit:

- 1) Added Filter C3JA to the Section 1.0 Emission Units Table under emission point C3IPE.
- 2) Added Filter C3JA to Table 7.1.2.
- 3) Increased VOC emissions for emission point C3IPE from 0.36 lb/hr and 0.28 tpy to 0.80 lb/hr and 0.58 tpy in Table 7.1.4.
- 4) Increased VOC emissions for emission point C3IQE from 0.36 lb/hr and 0.28 tpy to 0.40 lb/hr and 0.29 tpy in Table 7.1.4.
- 5) Added entries for Filter C3JA in the Appendix D, Attachments B and C record keeping forms.

### Non-Applicability Determinations

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

There were no additions or changes to the previous non-applicability determinations as a result of this modification.

### 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: NA

Ending Date: NA

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

Carrie McCumbers  
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**

Carrie McCumbers  
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. 1226 • Fax: 304/926-0478

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

No comments were received.