

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 February 28, 2005.

Permit Number: **R30-10700001-2003 (Part 7 of 14)**

Application Received: **December 10, 2007**

Plant Identification Number: **10700001**

Permittee: **E. I. du Pont de Nemours and Company**

Facility Name: **Washington Works**

Business Unit: **Engineering Polymers – West (Part 7 of 14)**

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

Permit Action Number: MM02 Revised: May 22, 2008

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 442.310 km Easting • 4,346.800 km Northing • Zone 17
Directions: North of State Route 892, three (3) miles west of intersection with State Route 68.

Facility Description

This minor modification includes changes covered by Permit R13-0871G:

- 1) correction of emission limits based on revised emission factors,
- 2) addresses the "as built" condition of the "Engineering Polymers – West" process area including re-naming and re-arranging of several existing emission units and emission points; addition of the following existing insignificant emission points added to the Emission Units Table during R13-0871G permitting process: 142-E-126, 142-E-127, 147-E-003, 147-E-004, 147-E-005; addition of the Emission Points 144-E-014 and 144-E-124 (former 142-E-124) listed in R13-0871F but overlooked during Title V minor modification MM01.

Emissions Summary

The following PTE changes resulted from this modification:

Criteria Pollutants	PTE change, TPY
PM10	- 3.85
HAPs	- 0.97
VOC	+ 0.37
CO	+ 0.02

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 a criteria pollutant, 10 tons per year of a single HAP, and 25 tons per year of aggregated HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Dupont 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 changes at this facility have been found to be subject to the following applicable rules:

Federal and State:	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR13	Preconstruction/modification permits
	45CSR30	Operating permit requirement.

State Only: None

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>)
R13-0817G	January 24, 2008	

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

1) The following new and re-named Emission Points are found to be subject to **45CSR§7-4.1**. (Requirement 4.1.1.): 142-E-005, 142-E-115, 142-E-125, 142-E-126, 142-E-127, 144-E-117, 144-E-124, 147-E-003, 147-E-005.

2) The following new and/or re-named Emission Points are found to be subject to **45CSR§§7-3.1. and 3.2.** (Requirements 4.1.3. and 4.1.4.): 142-E-005, 142-E-115, 142-E-125, 142-E-126, 142-E-127, 144-E-014, 147-E-003, 147-E-004, 147-E-005.

3) The following new Emission Points are found to be subject to **45CSR§7-3.7.** (Requirement 4.1.5.): 144-E-003, 144-E-117, 144-E-124.

Non-Applicability Determinations

None

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:

Natalya Chertkovsky
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

Natalya Chertkovsky
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

N/A