

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Significant 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 April 14, 2005.

Permit Number: **R30-10700001-2003**
Application Received: **January 12, 2009**
Plant Identification Number: **10700001**
Permittee: **E. I. du Pont de Nemours and Company, Inc.**
Facility Name: **Washington Works**
Business Unit: **Acrylic Resin Production (Part 1 of 14)**
Mailing Address: **P. O. Box 1217, Washington, WV 26181-1217**

Permit Action Number: SM01 Revised: April 27, 2009

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 892. Continue west on Route 892 with the plant being on the north side about one mile from the intersection of Routes 68 and 892.

Facility Description

DuPont Washington Works is a multiple business, multiple product line facility that produces plastic resins and their associated feedstock materials. In the Acrylic Resin Production Unit, various raw materials are blended and then reacted to form polyacrylates. The finished product is an acrylic resin in a bead form that is packaged and shipped to off-site customers.

The purpose of this significant modification is to incorporate the applicable terms and conditions from the Miscellaneous Organic NESHAP (MON) MACT Standard. This permit Segment has applicable terms and conditions from the MON MACT that were submitted as part of the site Notice of Compliance Status Letter on October 13, 2008.

Emissions Summary

There is no emission rate change associated with this modification.

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, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of 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 significant modification has been found to be subject to the following applicable rules:

Federal and State:	40 C.F.R 63 Subpart FFFF	Emissions standards for hazardous air pollutants.
	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.

Determinations and Justifications

Several requirements of the Miscellaneous Organic NESHAP (MON) MACT Standard apply to this facility. The MON MACT applies to any facility that operates miscellaneous organic chemical manufacturing process units (MCPUs) that are located at, or are part of, a major source of hazardous air pollutants (HAP) emissions as defined in section 112(a) of the Clean Air Act (CAA). The applicable requirements have been incorporated into this permit.

An A050C Carbon Adsorber has been added to the 3S Storage Tank (Emission Unit ID: A050S), which contains the HAP Methanol. This device will control working and breathing emissions through the use of carbon canisters on the vent piping to adsorb the emissions.

Equipment leaks are covered under 40 CFR Part 63 Subpart UU and 45CSR§21-37. Since portions of Subpart UU are more stringent than 45CSR§21-37, compliance with Subpart UU can be considered compliance with 45CSR§21-37.

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:

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: 304/926-0479

Response to Comments (Statement of Basis)

Not applicable.