

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 Fact Sheet corresponding with the Title V operating permit issued on November 24, 2009.

Permit Number: **R30-10700001-2009 (Part 6 of 14)**

Application Received: **January 21, 2010**

Plant Identification Number: **03-54-10700001**

Permittee: **E. I. du Pont de Nemours & Co.**

Facility Name: **Washington Works**

Business Unit: **Engineering Polymers - East (Part 6 of 14)**

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

Permit Action Number: *MM02* Revised: *July 12, 2010*

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 Route 50 bypass around Parkersburg towards Ohio. Take the last exit prior to the bridge exit from the Route 50 Bypass onto DuPont Road. At the light turn left onto DuPont road. The facility is on the right approximately ½ miles from the turn.

Facility Description

In the EPC - East Production Area (Part 6 of 14), polymer resins and other ingredients (such as plasticizers, fillers, reinforcing agents, anti-oxidants, flame-retardants, and colorants) are melt compounded through an extrusion/cutting operation into a final pelletized product.

Emissions Summary

Facility wide, there will not be an increase of emissions as a result of this modification. However, a transfer of equipment and/or processes from the Part 7 of 14 group to this Part 6 of 14 group will result in an increase of emissions for this group for Carbon Monoxide (CO) of 0.03 pounds per hour and 0.14 tons

per year, an increase in Volatile Organic Compounds (VOCs) of 0.08 pounds per hour and 0.35 tons per year, and an increase in total Hazardous Air Pollutants of 0.06 pounds per hour and 0.26 tons per year.

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.

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

Federal and State:	45CSR13	
	45CSR30	Operating permit requirement.
State Only:	45CSR27	Toxic Air Pollutants

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 (if any)
R13-2244I	April 27, 2010	

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. 45CSR13 – *Permits for Construction*

The Group 6 of 14 (Engineering Polymers East) and Group 7 of 14 (Engineering Polymers West) Title V Permits share some of the same equipment, including raw material storage silos, blenders, bulk unloading, and finished product silos. These emission sources were permitted under the Group 7 of 14 permit. As a resulting business decision, the Group 7 of 14 Permit was not renewed and has expired. However, the described equipment will still be used by the Group 6 process. As such, these emissions units and associated limits will be removed from the Group 7 permit and placed in the Group 6 Permit. There will be no associated facility wide increase of emissions as a result of this modification.

2. *45CSR27 – Toxic Air Pollutants*

Formaldehyde and Benzene potential emissions associated with the processing of polyester on CP-7 are less than the quantity in Table A that requires BAT (Best Available Control Technology) to be employed. To meet the requirements of 45CSR27-3.3, a Total HAP emission limit will be established for Emission Point 280-E-150 in R13-2244I that will identify Formaldehyde and Benzene as components of the Total HAP limit. The speciated HAP information provided in the emission calculations, indicate that the potential emissions from Benzene are 4.4 lb/year and from Formaldehyde are less than 1 lb/year. The limits for Benzene and Formaldehyde in Table A of 45CSR27 are each 1,000 lb/year.

The Total HAP emissions from all of the other emission points that are covered by permit R13-2244H are 680 lbs/year. The additional Benzene and Formaldehyde emissions associated with the revised R13-2244I for total HAP emissions from EPC-East will be less than 1,000 lbs/year for both Formaldehyde and Benzene.

Condition 4.1.9 has been added for emission sources and emission points subject to the requirements of 45CSR27, such that they shall be subject to the standards and requirements set forth in R13-2617C. R13-2617C is the site wide permit for Rule 21 and Rule 27 compliance. Condition 4.1.10 requires the permittee to submit an application to update Attachment A of R13-2617C by June 26, 2010 to incorporate the changes resulting from this modification.

Non-Applicability Determinations

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

None

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: N/A
Ending Date: N/A

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

Mike Egnor
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

N/A

Point of Contact

Mike Egnor
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601 57th Street SE
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Response to Comments (Statement of Basis)

Not applicable.