

Fact Sheet



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

Permit Number: **R30-10700001-2010**

Application Received: **October 14, 2009**

Plant Identification Number: **03-054-107-00001**

Permittee: **E. I. duPont de Nemours and Company, Inc.**

Facility Name: **Washington Works, Specialty Compounding Division (Group 8 of 14)**

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

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 422.27 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. DuPont Washington Works divided the initial Title V Permit Application into fourteen separate business units, each of which received a Title V Permit. This permit is Group 8 of 14, Specialty Compounding Division, which is a segment of DuPont Washington Works that produces polymer blends and mixtures through the use of mixing and extrusion facilities. Specialty Compounding Division takes raw materials, generally in a pellet or powder form, and mixes them together to create high performance plastic blends and polymers for use in automotive, aerospace, and other commercial manufacturing efforts located off-site.

Emissions Summary

Specialty Compounding Division Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions ⁵	2008 Actual Emissions ⁸
Carbon Monoxide (CO)	2.355	1.312
Nitrogen Oxides (NO _x)	0.84	0.84 ⁴
Particulate Matter (PM _{2.5}) ¹	244.32	0.023
Particulate Matter (PM ₁₀) ¹	250.38	0.055
Total Particulate Matter (TSP)	471.16	1.461
Sulfur Dioxide (SO ₂)	0	0
Volatile Organic Compounds (VOC)	2.93	0.773
Hazardous Air Pollutants ²	Potential Emissions	2008 Actual Emissions
Formaldehyde	3.29 ⁶	0.2128
Total HAPs ³	34.53 ⁷	0.2175

- PM_{2.5} and PM₁₀ are components of TSP.*
- Some of the HAPs may be counted as PM or VOCs.*
- Other HAPs included in "Total HAPs" are acetaldehyde, acrolein, aniline, antimony compounds, and phenol. The limit on Total HAP includes emissions of formaldehyde. No individual HAP has a PTE greater than 10 TPY.*
- In the form of NO₂.*
- Potential emissions of Regulated Pollutants are from technical correspondence (1/29/2010 email) received from the permittee.*
- Potential emissions of formaldehyde are from technical correspondence (1/29/2010 email) received from the permittee.*
- Potential emissions of Total HAPs is from the renewal application (p.24 of 230).*
- Actual emissions are from the 2009 Certified Emissions Statement Invoice, and represent emissions from January 1, 2008 through December 31, 2009.*

Title V Program Applicability Basis

This facility has the potential to emit over 100 TPY of criteria pollutants and over 25 TPY of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, and over 25 tons per year of aggregate HAPs, E. I. duPont de Nemours and Company's Washington Works Specialty Compounding Division (Group 8 of 14) 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	Construction permit requirements.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR21, Section 30	Cold and Solvent Metal Cleaning.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63, Subpart FFFF	Miscellaneous Organic Chemical Manufacturing (MON) MACT.
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR27	Best Available Technology (BAT) for 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 (<i>if any</i>)
R13-1533I	July 16, 2009	
R13-2617C	July 13, 2007	

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

Throughout the following discussions, the terms "current permit" or "current Title V" refer to permit R30-10700001-2003 (MM07) unless otherwise noted. Similarly, the term "current" refers to information already contained in the current permit, unless otherwise noted or if the context of the discussion provides for another meaning. The term "draft" refers to the draft/proposed renewal permit. Some condition numbers are marked as "Reserved" throughout the permit. The requirements that are in these current permit conditions were either removed prior to this renewal and marked as reserved; no longer exist; or are no longer applicable. Rather than adjusting permit condition numbers, these are now "Reserved" as a courtesy in order to minimize changes in the permittee's internal environmental tracking system. Also, the acronym "SCD" may be used to abbreviate "Specialty Compounding Division."

1. **45CSR6 – Control of Air Pollution from Combustion of Refuse.** The language of conditions 3.1.1. and 3.1.2. was modified to reflect the most recent language of the rule.
2. **45CSR§13-5.11. Permanent Shutdown.** This language is removed from condition 3.1.5. since this condition is no longer typically included in Title V permits. The permit condition is now reserved.
3. **45CSR30 – Operating Permits.**
Permit Subsection 1.1. – Emission Units Table Changes. The following Table A sets out information that is changed in permit subsection 1.1. to reflect changes in identification numbers; revise nomenclature to reflect that provided in the application and technical correspondence; add new equipment; and correct any misspelled words.

Table A

Identification No. (current permit)		Identification No. (draft/proposed permit)	Changed Row Entry (draft/proposed permit)	Corresponding Emission Unit	Affected Permit Conditions ⁴
No.	ID Type ¹				
S293-C-031	CD	S293-C-078 ²	Control Device ID	Miscellaneous Hoods	None
S293-S-024	EU	S293-S-03F	Emission Unit ID	Screen F	4.1.12.
S293-E-024	EP	S293-E-04F	Emission Point ID	Screen F	4.1.5., 4.1.6., 4.1.12., 4.2.1.
S293-C-024	CD	S293-C-04F	Control Device ID	Screen F	None
S293-C-05A	CD	None ³	Control Device ID	Impact Separator A	None
S293-C-05B	CD	None ³	Control Device ID	Impact Separator B	None
S293-C-05C	CD	None ³	Control Device ID	Impact Separator C	None
S293-C-05D	CD	None ³	Control Device ID	Impact Separator D	None
S293-C-04D	EU	S293-S-04D	Emission Unit ID	Impact Separator D	None
S293-C-030	CD	None ³	Control Device ID	Impact Separator F	None
S293-S-030	EU	S293-S-04F	Emission Unit ID	Impact Separator F	4.1.12.
S293-E-030	EP	S293-E-05F	Emission Point ID	Impact Separator F	4.1.5., 4.1.6., 4.1.11., 4.1.12., 4.2.1.
S293-S-070	EU	Same as current	EU Description	Dynamec (current); Dinamec (draft/proposed)	None
S293-S-066	EU	Same as current	EU Description	“Maintenance Cleaner” (current); “Cold Solvent Cleaner” (draft/proposed)	5.0 (Heading)
S293-S-067	EU	Same as current	EU Description	“Material Transfer Station” (current); “Rework Conveyor” (draft/proposed)	None
S293-S-068	EU	Same as current	EU Description	“Material Transfer Station” (current); “Packaging Transfer Station” (draft/proposed)	None

1 – ID Types: EP – Emission Point; EU – Emission Unit; CD – Control Device

2 – This change would affect the control device ID for Area Hoods as well since both Area Hoods and Miscellaneous Hoods have a common baghouse (i.e., S293-C-031) in the current permit. Therefore, a new row has been added for Miscellaneous Hoods since according to the application and technical correspondence the Miscellaneous Hoods have a different Control Device ID and Emission Point ID than the Area Hoods.

3 – The control device IDs for the Impact Separators A, B, C, D, and F are not included in the draft/proposed permit because it has been determined that each device is not a *Control device*, but is *Inherent Process Equipment* per the definitions in 40 C.F.R. §64.1.

4 – The change to the ID number in subsection 1.1. is also made in these permit conditions.

Reporting Language Changes

- U.S. EPA has instructed DAQ that permittees are to submit their annual compliance certification to U.S. EPA via e-mail only (i.e., no paper "hard copies" to U.S. EPA). Therefore, conditions 3.5.3. and 3.5.5. have been modified to provide for this new stipulation.

Miscellaneous Changes

- Condition 2.1.4. was added to match the most current permit "boilerplate" language. No other permit conditions are affected by this change.
 - During the course of technical correspondence, the permittee requested that any reference to the "Specialty Compounding Area" or "Specialty Compounding Manufacturing" or "Specialty Compounding Materials" or similar name, be replaced with "Specialty Compounding Division". Thus, all such references are changed in the permit. The affected permit conditions are: 3.1.12. through 3.1.15.; 3.2.1. through 3.2.3.; 3.3.3.; 3.4.4.; 3.4.5.; 3.5.10.; 3.7.2.a. through 3.7.2.g.; 3.7.2.k. through 3.7.2.y.; and 3.7.2.aa. through 3.7.2.dd.; and Appendix B – Attachment A of R13-2617.
 - The language "Compliance Certification" was added at the beginning of 3.5.5. to match current permit boilerplate.
 - The current permit had two (2) conditions numbered as 4.4.7. The second was corrected to 4.4.8.
 - The language "for a period of no less than five (5) years" was removed from conditions 4.4.8. and 4.4.9. since this record retention period is already specified by facility-wide condition 3.4.2.
4. **45CSR34 and Repealed 45CSR15 – Emission Standards for Hazardous Air Pollutants.** The state rule citation of condition 3.1.3. was changed from 45CSR15 to 45CSR34 since the former has been repealed and the latter now adopts regulations pursuant to 40 C.F.R. Part 61. The content of condition 3.1.3. is also updated to match the most current permit "boilerplate" language.

Non-Applicability Determinations

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

1. **45CSR15** – This state rule is specified in the current permit shield section 3.7.2.z. But in light of the fact that 45CSR15 was repealed, it is no longer necessary to list this rule. Furthermore, the current non-applicability determination actually is not true. Current permit condition 3.7.2.z. reads, "The Specialty Compounding Area is not subject to any requirements under 40 C.F.R. 61." Condition 3.1.3. bears out the fact that SCD is subject to a requirement under 40 C.F.R. 61. The language contained in 3.7.2.z. will be replaced with "Reserved" in the renewal permit.
2. **40 C.F.R. Part 64 – Compliance Assurance Monitoring.** None of the emission units listed in the renewal application (and any revised application pages) have pre-control emissions of a regulated air pollutant greater than the major source threshold for that pollutant; therefore, none of the emission units meet applicability criterion 40 C.F.R. §64.2(a)(3). Thus CAM is not applicable to any emission unit listed in the SCD renewal application.

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: April 13, 2010

Ending Date: May 13, 2010

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

Denton B. McDerment, P.E.
Title V Permit Engineer
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

Denton B. McDerment, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478

Response to Comments (Statement of Basis)Public Comments

No comments were received from the public, which includes the permittee.

U.S. EPA Comments

No comments were received from U.S. EPA.