

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 Fact Sheet corresponding with the Title V operating permit issued on October 1, 2010.

Permit Number: **R30-10700001-2010**
Application Received: **March 18, 2011**
Plant Identification Number: **03-54-10700001-2010**
Permittee: **E. I. du Pont de Nemours and Company**
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: *May 23, 2011*

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 442.368 km Easting • 4,346.679 km Northing • Zone 17
Directions: 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

A compliance plan was specified in conditions 4.6.1 and 4.6.2 of R30-10700001-2010 (Part 1 of 14) for tanks A010.1S and A010.2S and the non-regenerative carbon adsorbers A010C used to control emissions from these tanks. By no later than October 1, 2010, DuPont was required to submit a request to US EPA Region III for an alternative method of compliance with 40 C.F.R. 63, Subpart FFFF. Within 30 calendar days of EPA's approval or denial of the request, DuPont was required to submit an application for a Title V significant modification permit in order to either incorporate the terms and conditions contained

in EPA's alternative monitoring approval letter (if such request was approved) or to incorporate the applicable requirements of 40 C.F.R. 63, Subpart FFFF (if such request was denied). DuPont's request was submitted on August 5, 2010. EPA approved DuPont's alternative monitoring plan in a letter dated February 16, 2011. The purpose of this Title V significant modification is to incorporate the terms and conditions contained in EPA's alternative monitoring plan approval letter.

Emissions Summary

There were no emission rate changes resulting from this Title V significant modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the facility-wide 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. Therefore, 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	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutant
	40 C.F.R. 63, Subpart FFFF	Miscellaneous Organic Chemical Manufacturing.
State Only:	N/A	

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>)
R13-0181C	October 12, 2005	None
R13-2617E	November 30, 2010	None

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

New 40 C.F.R. 63, Subpart FFFF Requirements for Tanks A010.1S and A010.2S and Carbon Adsorbers A010C

New requirements to incorporate the alternative monitoring plan submitted by DuPont on August 5, 2010 and approved by US EPA Region III on February 16, 2011 were added as conditions 4.1.10.b.iii, 4.2.3, 4.4.9, and 4.5.2. Since DuPont has completed the terms of the compliance plan, conditions 4.6.1 and 4.6.2 were removed.

Additional details concerning why DuPont needed to request an alternative monitoring plan, were specified in the Fact Sheet for R30-10700001-2010 (Part 1 of 14).

Update of the 45CSR21 and 45CSR27 Requirements

Since the Title V permit was being modified, the 45CSR21 and 45CSR27 requirements were updated to reflect the most recent version of R13-2617 (R13-2617E, issued on November 30, 2010). The changes to the Title V permit occurred only in Appendix B where the revision letter was removed from the affected R13 permits in the table and Note #5 was added to explain that the revision letter was left off, but the reference is to the most current version of the numbered permit.

Non-Applicability Determinations

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

There were no non-applicability determinations made as part of this significant 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: April 4, 2011
Ending Date: May 4, 2011

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 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

Carrie McCumbers
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th 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.