

Fact Sheet



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

Permit Number: R30-10700001-2012
Application Received: November 23, 2009
Plant Identification Number: 10700001
Permittee: E.I. du Pont de Nemours and Company
Facility Name: Washington Works
Business Unit: Power and Service Support (Part 10 of 14)
Mailing Address: P. O. Box 1217, Washington, WV 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 and resins and their associated feedstock materials. Power and Services manages and operates the plant infrastructure to support the operating business units. As part of these operations Power and Services operates both gas and coal fired boilers to produce steam for on-site use. Power and Services personnel also operate an industrial wastewater treatment facility, a sanitary wastewater treatment facility, an air compressor system to supply plant air, and a water treatment facility to supply treated water for both process uses and sanitary uses on-site.

Emissions Summary

Power and Services Emissions Summary [Tons per Year]³		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	742	303.59
Nitrogen Oxides (NO _x)	2445	1055.65
Lead (Pb)	0.06	0.03
Particulate Matter (PM _{2.5}) ¹	65.3	6.67
Particulate Matter (PM ₁₀) ¹	339.6	35.7
Total Particulate Matter (TSP)	590.8	61.2
Sulfur Dioxide (SO ₂)	10448	1999.01
Volatile Organic Compounds (VOC)	673.5	54.52

PM₁₀ is a component of TSP.

Hazardous Air Pollutants²	Potential Emissions	2010 Actual Emissions
Combined Total of all HAPs with potential emissions of <1TPY	15.97609	
Formaldehyde	25.03	0.64
Hydrogen Chloride	545.9	223.8
Hydrogen Fluoride	20.22	8.75
Methanol	112.13	634
Toluene	17	6.19
Regulated Pollutants other than Criteria and HAP	Potential Emissions	2010 Actual Emissions
Sulfuric Acid Mist	182	74.6
Ammonia	7.5	0.08

¹PM_{2.5} and PM₁₀ are components of TSP.

²For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

³Does not contain PTE and active emissions for the comparable fuels boiler and natural-gas process heaters contained in Section 9 of the permit

Title V Program Applicability Basis

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

Federal and State:

45CSR2	Particulate matter and opacity limits for indirect heat exchangers.
45CSR6	Open burning prohibited.
45CSR7	Particulate matter and opacity limits for manufacturing sources.
45CSR10	Sulfur dioxide limits.
45CSR11	Standby plans for emergency episodes.
45CSR14	Permits for construction and major modification of major stationary sources of air pollution for the Prevention of Significant Deterioration.
45CSR13	New Source Review permits for stationary sources
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
45CSR16	Standards of Performance for New Stationary Sources pursuant to 40 C.F.R. Part 60.
45CSR21, Section 30	Solvent Metal Cleaning.
45CSR30	Operating permit requirement.
40 C.F.R. Part 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.
40 C.F.R. Part 61	Asbestos inspection and removal
40 C.F.R. Part 63, Subpart DDDDD	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)

	40 C.F.R. 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
	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>
R14-14	01/02/2002	PD09-045.
R13-2617E	11/30/2010	
R13-2654	01/30/2007	

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

Since the most recent version of this permit, the following changes/additions have been made:

- The Title V permit boilerplate has been revised such that a new Section 1.2 Table has been added which lists all the active R13, R14, and/or R19 permits and their date(s) of issuance. Also, the underlying authority for any conditions from the R13, R14, and/or R19 permits has been changed to cite the original permit number in the Title V permit. These changes will eliminate the need to go through the entire Title V permit to change the R13, R14, and/or R19 permit numbers each time an R13, R14, and/or R19 permit is modified. The only required change will be to the Section 1.2 Table
- Conditions 3.1.1, 3.1.2, 3.1.3, 3.3.1, 3.4.3, 3.5.4, 3.5.8 have been revised and condition 3.1.5 has been removed because of new boilerplate language. Conditions 3.1.5 through 3.1.13 have been renumbered because of this change.

- Conditions 4.2.5 through 4.2.9, 4.3.5, 4.3.6, 4.4.7, 4.4.8, 4.5.3 have been added for CAM requirements for Boilers.
- Conditions 4.3.1 and 4.3.3 have been updated per company's request.
- Conditions 4.2.2, 5.2.3 and 6.2.1 have been revised per company's request.
- Emission Unit ID, P999 (Ash storage Pile) has been added to Emission Unit Table 1.1. As stated in PD09-045, it has been determined that a permit will not be required under 45CSR13 for a proposed construction of P999, Ash storage Pile. This determination is based on information included with permit determination form sent by company on July 10, 2009, which indicates that the increase in emissions will not exceed two (2) lbs/hr or five (5) tons/year of total Hazardous Air Pollutants (HAPs); six (6) lbs/ hour and ten (10) TPY of any regulated pollutant; or trigger a substantive requirement of any State or Federal air quality regulation. This ash storage pile is subject to a minimization of particulate matter requirement from 45CSR§2-5.1, which is found in condition 4.1.3.
- Region 3 has requested that all annual compliance certifications be submitted electronically (e-mail), so the permit templates have been updated in conditions 3.5.3 and 3.5.5.
- Emission Unit Table has been updated per company's request. Emission unit IDs-P213, P216, P216-2, P216-3, P216-4, P216-6, P217, P224, P230, P401, P402, P403-1, P403-2, P404, P405, P406, P407, P408, P221, P802, P807, P809, P828, P405, P806, P808, P811, P813, P501, P502, P604, P830, P831, P832, P840, P841, P842, P901-1, P901-2, P902-1, P902-2, P904-1, P904-2, P906-1, P906-2 are insignificant sources and have been removed from emission unit table. Please note that Emission Unit IDs -P998 and P997 were also identified in the Title V renewal application as insignificant sources, but since these emission units were not previously included in the Emission Unit Table, no update was required for these sources.
- The Emission unit IDs-P203, P204, P223, P222, P608, P304 are not in service. Therefore, they have been removed from the emission unit table.
- The Emission unit IDs-P701, P701-1, P701-2, P701-3, P701-4, P843 are idled. Therefore, they have been removed from the emission unit table.
- Since Emission unit IDs P203 and P204 are not in service, they have been removed from conditions 8.1.2 and 8.4.2 of this permit.
- The Emission unit ID P223 is not in service therefore, it has been removed from conditions 6.1.2 and 6.4.2 of this permit.
- Condition 6.5.1 has been removed from this permit because Emission unit ID P223 is no longer in service.
- In an appendix A, revised 45CSR2/2A Plan has been attached and Appendix D has been updated.
- Previous Condition 4.2.2 was added per 45CSR§30-5.1.c requiring monthly method 22 checks to determine if there were visible emissions from emission point 475. These checks are no longer necessary to demonstrate compliance with condition 4.1.1 since the CAM requires daily method 9 for emission point 475 as referenced in condition 4.2.5.

40 C.F.R. 63, Subpart DDDDD (Boiler MACT) Requirements for Coal Fired & Natural Gas Boilers [Emission Unit ID No. -P01-P06 & P08].

On February 21, 2011, EPA signed the final rule for the Boiler MACT. This rule was published in the Federal Register on March 21, 2011 which established the existing source compliance date as March 21,

2014 [the new source compliance date was May 20, 2011). The Boilers 1-6 & 8 [Emission Unit ID Nos.- P01-P06 & P08] are coal-fired and natural gas with a maximum design heat input of MMBtu/hr as shown in the table below. The 40 C.F.R. 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters," placeholder language was included as Condition 3.1.14.

Emission Unit Description	Design Capacity
No. 1 Boiler (Coal Fired, Spreader-Stoker)	64.2 MMBtu/hr
No. 2 Boiler (Coal Fired, Spreader-Stoker)	64.2 MMBtu/hr
No. 3 Boiler (Coal Fired, Spreader-Stoker)	94 MMBtu/hr
No. 4 Boiler (Coal Fired, Spreader Stoker)	125 MMBtu/hr
No. 5 Boiler (Coal Fired, Spreader-Stoker)	181 MMBtu/hr
No. 6 Boiler (Coal Fired, Spreader-Stoker)	241 MMBtu/hr
No. 8 Boiler (Natural Gas)	181 MMBtu/hr

On May 18, 2011 EPA published a Federal Register final rule (76 FR 28662-28664) staying 40 CFR 63, Subpart DDDDD in its entirety along with an indefinite delay of its effective date. However, on January 9, 2012 the US District Court for the District of Columbia declared unlawful EPA's May 18, 2011 stay and delay of the major source Boiler MACT (40 CFR 63, Subpart DDDDD) and new portions of CISWI (40 CFR 60, Subparts CCCC and DDDD). However, EPA has plans to finalize its reconsidered versions of these rules by Spring 2012, and replace these newly reinstated rules, including re-setting of reporting and compliance timelines. In a January 18, 2012 letter to Senator Wyden of Oregon, EPA Administrator Jackson stated that using its enforcement discretion, EPA does not intend for the recent court decision to impact new or existing sources in the interim before the new rules are promulgated.

40 C.F.R. 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE): The facility maintains three Emergency Fire Pumps—and a generator. These engines are covered by 40 CFR 63, Subpart ZZZZ provisions. The compliance date for the rule provisions is May 3, 2013.

These engines are classified as emergency engines rated at less than 500 HP at Major Sources of HAPs. These engines are covered by 40 CFR 63, Subpart ZZZZ as follows:

- These engines must comply with the emission limitations in 40 C.F.R. §63.6602 and Table 2c to this subpart. These limits were added as condition 9.1.1.a.
- These engines must comply with the continuous compliance requirements & general requirements in 40 C.F.R. §§63.6605 and 63.6640. These requirements were added as conditions 9.1.1.b and d, 9.5.1, 9.5.2, 9.5.3, and 9.5.4.
- These engines must comply with the general provisions of 40 CFR part 63. Except per 40 C.F.R. §63.6645(a)(5), the following do not apply: §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h). This requirement was added as condition 9.1.1.c.

- These engines must be operated in compliance with the monitoring, installation, collection, operation, and maintenance requirements of 40 C.F.R. §§ 63.6625(e), (f), (h), and (i). These requirements were added as condition 9.2.1.
- These engines must be operated in compliance with the recordkeeping requirements of 40 C.F.R. §§63.6655(a), (b), (d), (e), and (f). These requirements were added as condition 9.4.1.

40 C.F.R. Part 64 – Compliance Assurance Monitoring (CAM)

The permittee included a CAM plan in the renewal application for the six coal fired boilers (CFB) P01, P02, P03, P04, P05 and P06. The Coal fired boilers- CFB#1 (P01), CFB#2 (P02), CFB#3 (P03), CFB#4 (P04), CFB#5 (P05), CFB#6 (P06) are respectively controlled by the following control devices P101C, P102C, P103C, P104C, P105C and P106C. CFB #1 and #2 share Stack#1 (SourceID#475), but have different types of control devices, CFB #3 and #4 share Stack#2 (SourceID#476), CFB #5 and #6 share Stack#3 (SourceID#477).

Each coal fired boiler has the potential to emit over 100 tons per year of NO_x, SO₂ and PM which are criteria pollutants. Since the boilers have control devices to comply with PM emission limits, the boilers are subject to CAM, per 40CFR§64.2(a).

Coal fired boilers (CFB) P04, P05 and P06 are exempted from CAM (per 64.2(b) (1) (vi)) due to monitoring established in a 45CSR2/2A monitoring plan incorporated within the Title V Permit.

Coal fired boilers (CFB) P01, P02, P03 do not have control device monitoring under the 45CSR2/2A monitoring plan and are therefore subject to CAM.

Coal fired boiler (CFB) P01 is unique and doesn't use a baghouse as a Control Device. The CAM plan for P01, is shown in Table 2. Coal fired boilers (CFB) P02 and P03 both use a baghouse as a control device. The CAM plan for P02 and P03 is shown in Table 3.

Table 1 - Sources subject to CAM Plan requirements

Emission Point ID	Control Device	Emission Unit ID	Emission Unit Description	Design Capacity	Year Installed
475	P101C Mechanical(cyclone) separators	P01	No. 1 Boiler (Coal Fired, Spreader-Stoker)	64.2 MMBtu/hr	1947
475	P102C Single Stage Mechanical Dust Collector and Baghouse filter Unit	P02	No. 2 Boiler (Coal Fired, Spreader-Stoker)	64.2 MMBtu/hr	1947
476	P103C Single Stage Mechanical Dust Collector and Baghouse filter Unit	P03	No. 3 Boiler (Coal Fired, Spreader-Stoker)	94 MMBtu/hr	1957

Table 2- Summarizes the proposed CAM-related testing and CAM plan**Table 2 – Compliance Assurance Monitoring for PM from the CFB Boiler #1 (P01)**

Elements of the CAM Plan	Indicator No. 1 of 1
I. GENERAL CRITERIA	Visible Emissions
Monitoring Approach	Visible emission checks shall be conducted at emission point(ID475) by personnel trained in the practices of 40 CFR 60, Appendix A, Method 9.
Indicator Range	No greater than 10% Opacity. An excursion is defined as any opacity greater than 10%.
QIP threshold	If the number of excursions for visible emissions exceeds 5 percent of the total days operated for the boilers during a 6-month semiannual reporting period, a QIP must be addressed.
II. PERFORMANCE CRITERIA	
Specifications for obtaining representative data	Visible emissions are taken by individuals trained and certified in accordance with 40CFR 60 Method 9. Since Boiler #1 shares a common Stack and combined emission limit with Boiler#2, the 10% limit shall apply to the stack during Boiler #1 only venting scenarios as well as while operating simultaneously with Boiler#2
Verification of Operational Status	Not applicable
QA/QC Practices and Criteria	The observer will be a Method 9 trained observer and must follow EPA Method 9 procedures.
Monitoring frequency	Must collect data at least once per 24 hour period.
Data Collection Procedure	Observations by certified personnel are documented and records maintained for a period of 5 years.
Observation Period	The observation period is on a six-minute block average basis.

Table 3 – Compliance Assurance Monitoring for PM from the CFB Boilers #2 (P02) and #3 (P03) and associated Baghouses

Elements of the CAM Plan	Indicator No. 1 of 1
I. GENERAL CRITERIA	Bag-house differential pressure drop
Monitoring Approach	At least once per day monitoring of bag house differential pressure drop.

Elements of the CAM Plan	Indicator No. 1 of 1
Indicator Range	Maintaining the pressure drop across the baghouse equal to or greater than 0.75" W.C. ensures compliance with PM emission limits set forth in 45CSR 2/2A monitoring Plan. An excursion is defined as a daily average pressure drop of less than 0.75" W.C. The CAM plan shall be implemented within 180 days of issuance of this Permit.
QIP threshold	If the number of excursions for bag house differential pressure exceeds 5 percent of the total days operated for the boilers during a 6-month semiannual reporting period, a QIP must be addressed
II. PERFORMANCE CRITERIA	
Specifications for obtaining representative data	The pressure measurements shall be taken in the appropriate locations on each baghouse. The pressure drop across the baghouse is measured with a differential pressure transmitter, or equivalent. Representative Data shall exclude periods of Startup, Shutdown, or Malfunctions(SSM)
Verification of Operational Status	Not applicable to existing non-modified monitoring equipment.
QA/QC Practices and Criteria	The pressure gauge and the reader are calibrated annually.
Monitoring frequency	At least once per day
Data Collection Procedure	Observation of differential pressure transmitters by plant personnel and log entries of differential pressure drop or record the differential pressure by means of an electronic Data Historian.
Observation Period	Daily average shall not include SSM

Non-Applicability Determinations

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

- a. 40 C.F.R. 60, Subpart D – “Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After August 17, 1971.” This subpart applies to each steam generating unit that commences construction or modification after August 17, 1971 and has a heat input capacity of more than 250 MMBtu/hr. The boilers in the Power and Service Support Area are less than 250 MMBTU/hr and Nos. 1, 2, 3, 4, 5, and 6 Boilers were constructed prior to August 17, 1971.

- b. 40 C.F.R. 60, Subpart Da – “Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After September 18, 1978.” This subpart applies to each steam generating unit that commences construction or modification after September 18, 1978 and has a heat input capacity of more than 250 MMBtu/hr. The boilers in the Power and Service Support Area are less than 250 MMBTU/hr and Nos. 1, 2, 3, 4, 5, and 6 Boilers were constructed prior to September 18, 1978.
- c. 40 C.F.R. 60, Subpart Db – “Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.” This subpart applies to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984 and has a heat input capacity of greater than 100 MMBtu/hr. No. 8 Boiler is subject to this rule, but Nos. 1, 2, 3, 4, 5, and 6 Boilers were constructed prior to the June 19, 1984 applicability date and Nos. 1, 2, and 3 Boilers also have a heat input capacity of less than 100 MMBtu/hr.
- d. 40 C.F.R. 60, Subpart Dc – “Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.” This subpart applies to each steam generating unit that commences construction, modification, or reconstruction after June 9, 1989 and has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. All the boilers in the Power and Service Support Area with a design heat input greater than or equal to 10 MMBtu/hr, but less than 100 MMBtu/hr were constructed prior to the June 9, 1989 applicability date.
- e. 40 C.F.R. 60, Subpart E – “Standards of Performance for Incinerators.” The Power and Support Services Area does not operate any equipment which meets the definition of an incinerator as specified in 40 C.F.R. §60.51.
- f. 40 C.F.R. 60, Subpart K - “Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.” There are no petroleum liquid storage tanks in the Power and Service Support Area with a storage capacity greater than 151,412 liters, constructed, reconstructed, or modified after June 11, 1973 and prior to May 19, 1978.
- g. 40 C.F.R. 60, Subpart Ka - “Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984.” There are no petroleum liquid storage tanks in the Power and Service Support Area with a storage capacity greater than 151,416 liters for which construction, reconstruction, or modification commenced after May 18, 1978 and prior to July 23, 1984.
- h. 40 C.F.R. 60, Subpart Kb - “Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.” There are no volatile organic liquid storage tanks in the Power and Service Support Area with a storage capacity greater than or equal to 75 m³ for which construction, reconstruction, or modification commenced after July 23, 1984.
- i. 40 C.F.R. 60, Subpart O – “Standards of Performance for Sewage Treatment Plants.” The Power and Service Support Area does not operate an incineration unit or boiler to burn sludge from a municipal sewage treatment plant.
- j. 40 C.F.R. 60, Subpart Y – “Standards of Performance for Coal Preparation Plants.” This subpart applies to any facility that commences construction or modification after October 24,

1974. There are no coal handling facilities in the Power and Service Support Area that were constructed, modified, or reconstructed after the October 24, 1974 applicability date.

- k. 40 C.F.R. 60, Subpart VV - "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry." The Power and Service Support Area does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.
- l. 40 C.F.R. 60, Subpart DDD - "Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry." The Power and Service Support Area does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
- m. 40 C.F.R. 60, Subpart RRR - "Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes." The Power and Service Support Area does not produce any of the chemicals listed in §60.707 as a product, co-product, by-product, or intermediate.
- n. 40 C.F.R. 60, Subpart CCCC - "Standards of Performance for Commercial and Industrial Solid Waste Incineration units for Which Construction is Commenced after November 30, 1999 or for Which Modification or Reconstruction is Commenced on or After June 1, 2001." The Power and Service Support Area does not operate a commercial and industrial solid waste incineration (CISWI) unit as defined by 40 C.F.R. §60.2265.
- o. 40 C.F.R. 60, Subpart DDDD - "Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units that Commenced Construction on or Before November 30, 1999." The Power and Service Support Area does not operate a commercial and industrial solid waste incineration (CISWI) unit as defined by 40 C.F.R. §60.2875.
- p. 40 C.F.R. 61, Subpart V - "National Emission Standards for Equipment Leaks (Fugitive Emissions Sources)." Applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in the Power and Service Support Area.
- q. 40 C.F.R. 61, Subpart FF - "National Emission Standard for Benzene Waste Operations." The Power and Service Support Area, specifically the Wastewater Treatment Plant, is not subject to this subpart other than the requirements of 40 C.F.R. §61.342(a) to perform an annual assessment of applicability and the record keeping requirements of 40 C.F.R. §§61.356(a) and 61.356(b).
- r. 40 C.F.R. 63, Subpart F - "National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry." 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- s. 40 C.F.R. 63, Subpart G - "National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater." 40 C.F.R. 63, Subpart G does not apply to the Power and Service Support Area because they do not handle or treat a Group 1 wastewater stream. Applicable recordkeeping and reporting requirements for Group 2 wastewater streams are the responsibility of the producing area subject to the MACT standard and not the wastewater treatment area.

- t. 40 C.F.R. 63, Subpart H - "National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks." 40 C.F.R. 63 Subpart H does not apply to manufacturing process units that do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).
- u. 40 C.F.R. 63, Subpart Q - "National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers." The Power and Service Support Area does not operate any cooling towers using chromium based treatment chemicals.
- v. 40 C.F.R. 63, Subpart T - "National Emission Standards for Halogenated Solvent Cleaning." The Power and Service Support Area does not operate any solvent cleaning machines containing the halogenated cleaning solvents specified in 40 C.F.R. §63.460(a).
- w. 40 C.F.R. 63, Subpart DD - "National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations." This subpart applies to units that receive waste/wastewater from off-site operations for treatment or recovery and the off-site waste contains hazardous air pollutants. This subpart does not apply to the Wastewater Treatment Plant at DuPont Washington Works because the treatment of off-site wastewater is not the predominate activity performed at the Washington Works facility as required in 40 C.F.R. §63.680(a)(2)(iii)(B).
- x. 40 C.F.R. 63, Subpart EEE - "National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors." The Power and Service Support Area does not operate any equipment meeting the definition of a hazardous waste combustor as specified in 40 C.F.R. §63.1201(a).
- y. 40 C.F.R. 63, Subpart JJJ - "National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins." The Power and Service Support Area does not produce the materials listed in 40 C.F.R. §63.1310.
- z. 40 C.F.R. 82, Subpart B - "Protection of Stratospheric Ozone." This subpart requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing the equipment need to be licensed. The Power and Service Support Area does not conduct motor vehicle maintenance involving CFCs on site.
- aa. 40 C.F.R. 82, Subpart C - "Protection of Stratospheric Ozone." This subpart bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. The Power and Service Support Area does not use, manufacture, nor distribute these materials.
- bb. 45CSR5 - "To Prevent and Control Air Pollution from the Operation of Coal Preparation Plants, Coal Handling Operations and Coal Refuse Disposal Areas. The Power and Service Support Area operates the coal storage and handling facilities under the requirements of 45CSR2 and does not operate a separate coal preparation plant or a coal refuse disposal area that would be subject to 45CSR5.
- cc. 45CSR6 - "To Prevent and Control Air Pollution from Combustion of Refuse." The Power and Service Support Area does not engage in the combustion of refuse in any installation or equipment.
- dd. 45CSR18 - "To Prevent and Control Emissions from Commercial and Industrial Solid Waste Incineration Units." The Power and Service Support Area does not operate any equipment

defined by 45CSR§18-2.3 as a commercial and industrial solid waste incineration (CISWI) unit.

- ee. 45CSR§21-40 – “Other Facilities that Emit Volatile Organic Compound (VOC).” None of the emission sources in the Power and Service Support Area have maximum theoretical emissions of 6 pounds per hour or more and are subject to the requirements of this section. The wastewater treatment facilities are specifically exempted from applicability for 45 CSR 21.
- hh. 40 C.F.R. 63, Subpart EEEE – “National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline).” The Power and Service Support Area does not operate an organic liquids distribution (OLD) operation or does not handle material organic liquids as defined in §63.2406.

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: March 2, 102
Ending Date: April 2, 2012

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

Beena Modi
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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

N/A