

Fact Sheet



For Proposed 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 June 1, 2010.

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

Application Received: **November 22, 2010 and April 22, 2011**

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**

Permit Action Number: MM01 and MM02

Revised: Proposed

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

As a result of this modification, there will be an increase of a Potential to Emit of emissions as shown in the Table below:

Specialty Compounding Division Emissions Summary	
[Tons per Year]	
Regulated Pollutants	Potential Emissions Increase
Carbon Monoxide (CO)	0.15
Nitrogen Oxides (NO _x)	N/A
Particulate Matter (PM ₁₀)	0.55
Total Particulate Matter (TSP)	9.29
Sulfur Dioxide (SO ₂)	N/A
Volatile Organic Compounds (VOC)	0.28
Hazardous Air Pollutants	Potential Emissions Increase
Formaldehyde	0.86
Phenol	0.01
Acetaldehyde	<0.01
Total HAPs	1.01

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains 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.

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

Federal and State:	45CSR7	Particulate Matter Emissions
	45CSR13	
	45CSR30	Operating permit requirement.

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>)
R13-1533K	July 18, 2011	

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 – R13-1533J

This Permit modification addresses the need for plop buggies S293-S-06A – 06F to be used for extruded polymer for startup and/or dropped strand or feed problems. The modification also identifies emissions from the existing Quench Baths S293-S-07A – 07F. These units have been added to the equipment table on Page 5, and the emission limitations are given in Table 4.1.1 on Page 30. The lbs/yr emission limits of Table 4.1.1 has been changed to tons per year. The plop buggies are also subject to the 20% opacity requirements of Condition 4.1.5, exception of Condition 4.1.6, and opacity monitoring of Condition 4.2.1. The Quench Bath S293-S-06F and Plop Buggy S293-S-07F are additionally subject to the particulate matter limits of Condition 4.1.12. Vents from Pelletizers S293-S-010(A-D, F) are being rerouted from existing vents S293-S-03(A-D, F) to the Cooler-Screener vents S293-E-04(A-D, F). The equipment list and Table 4.1.1 have been updated to reflect this change.

2. 45CSR13 – R13-1533K

This Permit modification installed a new baghouse inherent process device (S-293-C-01F) and rotary discharge valve on top of an existing silo. There will also be a minor increase of Formaldehyde due to the transfer of acetal resin to Vent S293-S. The year installed has been revised on Page 4.

3. 45CSR30 – Operating Permits

The following miscellaneous changes have been made to this permit:

The Permit number on page 1 has been revised.

The page numbers listed on page 2 has been revised.

Some of the emission unit id's have been renamed to match that in the Rule 13 Permit.

The R13 citation has been revised on page 6.

The Condition numbers in Section 3.1 have been revised.

Some of the emission unit descriptions in Table 4.1.1 on Page 30 have been revised to match the NSR permit description.

Non-Applicability Determinations

1. Greenhouse Gas Tailoring Rule

This is a modified Title V Permit and there have been no modifications that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

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

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

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478

Response to Comments (Statement of Basis)**(Choose)** Not applicable.**OR**

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.