

Fact Sheet



For Draft/Proposed Reopening for Cause Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Reopening for Cause, 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: **August 13, 2012**
Plant Identification Number: **03-54-107-00001**
Permittee: **E. I. du Pont de Nemours and Company**
Facility Name: **Acrylic Resin Production (Part 1 of 14)**
Mailing Address: **P.O. Box 1217, Washington, WV 26181-1217**

Permit Action Number: *RE01* Revised: *Draft/Proposed*

Physical Location: Washington Works, 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

Production of a series of acrylic resins from acrylic monomers

Emissions Summary

There are no changes in potential or actual emissions associated with this permitting action.

Title V Program Applicability Basis

With the proposed changes associated with this permitting action, this facility maintains the facility-wide potential to emit over 100 tons per year of criteria pollutants, 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 reopening for cause permitting action 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: None

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

- **40CFR63, Subpart FFFF – National Emission Standard for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing**

The facility has discovered that the Heat Exchange Systems of the Acrylic Resins Manufacturing unit are subject to 40CFR63, Subpart FFFF.

The following Conditions have been added to the Title V Permit:

Condition 4.1.10.e. has been added and requires the Permittee to comply with the applicable requirements for heat exchange systems from 40 C.F.R. §63.2490 and in Table 10 of 40 C.F.R. 63, Subpart FFFF.

Condition 4.2.4 has been added and requires the Permittee to monitor the heat exchange systems for leaks.

Condition 4.3.6 has been added and requires the Permittee to perform testing in order to monitor the heat exchange systems for potential HAP leaks.

Condition 4.4.8 has been revised to include recordkeeping for the heat exchange systems.

Condition 4.5.1 has been revised to include reporting for the heat exchange systems.

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: December 4, 2012
Ending Date: January 3, 2013

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)

Draft