

Fact Sheet



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

Permit Number: **R30-10700001-2013**
Application Received: **September 23, 2013**
Plant Identification Number: **107-00001**
Permittee: **E. I. du Pont de Nemours and Company**
Facility Name: **Washington Works**
Central Laboratory Services (Part 13 of 14)
Mailing Address: **P. O. Box 1217, Washington, WV 26181-1217**

Revised: N/A

Physical Location: Washington, Wood County, West Virginia
UTM Coordinates: 442.368 km Easting • 4,346.679 km Northing • Zone 17
Directions: Route 68 west from Parkersburg to intersection of Route 862. Continue west on Route 862 with the plant being on the north side about one mile from the intersection of Routes 68 and 862.

Facility Description

Central Laboratory Services (Part 13 of 14) is the result of consolidation of laboratory services involved with the final product qualification and testing, intermediate process sample analysis, and raw material qualification. The area also maintains a small facility for environmental testing, principally for water and for OSHA compliance monitoring.

DuPont Washington Works has divided the Title V Permit Application into the following fourteen separate business units for which each has a Title V Permit:

Acrylic Resin Production	Part 1 of 14
Fluoropolymer Production	Part 2 of 14
Acetal Resin Production	Part 3 of 14
Polyvinyl Butyral Production	Part 4 of 14

Nylon Resins Production	Part 5 of 14
Engineering Polymers Compounding Production - East	Part 6 of 14
Engineering Polymers Compounding Production - West	Part 7 of 14 (Permanently Shut down)
Specialty Compounding Production	Part 8 of 14
Filaments Production	Part 9 of 14
Power and Service Support Facilities	Part 10 of 14
Research and Development (R&D)	Part 11 of 14
Facilities, Construction and Support (FC&S)	Part 12 of 14
Central Laboratory Services	Part 13 of 14
Central Maintenance Services	Part 14 of 14

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Group 13 of 14 Potential Emissions	Group 13 of 14 2012 Actual Emissions
Carbon Monoxide (CO)	0.0645	< 0.01
Nitrogen Oxides (NO _x)	0.0096	< 0.01
Particulate Matter (PM _{2.5})	< 0.01	< 0.01
Particulate Matter (PM ₁₀)	0.98	0.06
Total Particulate Matter (TSP)	0.98	0.06
Sulfur Dioxide (SO ₂)	< 0.01	< 0.01
Volatile Organic Compounds (VOC)	0.541	0.07
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Group 13 of 14 Potential Emissions	Group 13 of 14 2012 Actual Emissions
Total HAPs	0.16	0.05

Some of the above HAPs may be counted as PM or VOCs.

This entire facility has the potential to emit equal to or greater than 100,000 tons per year of carbon dioxide equivalent (CO₂e) and 100 tons per year of greenhouse gases (GHGs) on a mass basis.

Title V Program Applicability Basis

Due to the facility-wide potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year 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:	45CSR6 45CSR7 45CSR11 45CSR13 WV Code § 22-5-4 (a) (14) 45CSR30 40 C.F.R. Part 61 40 C.F.R. Part 82, Subpart F	Open burning prohibited. Particulate matter and opacity limits for manufacturing sources. Standby plans for emergency episodes. Permits for construction, modification, relocation, etc. The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Asbestos inspection and removal Ozone depleting substances
State Only:	45CSR4 45CSR27	No objectionable odors. Best Available Technology (BAT) for HAPs

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the 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>)
R13-2617F	March 29, 2012	
R13-2654B	January 11, 2013	

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," which may be downloaded from DAQ's website.

Determinations and Justifications

Changes made to the Title V Permit since the last renewal are summarized below:

1. Miscellaneous
 Changes have been made to the Permit boilerplate.

2. Condition 4.2.1 contained language proposed by the Permittee that monitoring for opacity would be performed at least once per month with a maximum of forty-five (45) days between consecutive readings. As a result of a request by the Permittee, the maximum of 45 days between consecutive readings provision has been removed from the Permit.
3. Removed monitoring in Condition 4.2.1 for L046, L047, and L048 because monitoring requirements for these emission units already exist in Condition 5.2.1.

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 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 storage tanks in Central Laboratory Services.
- b. 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 storage tanks in Central Laboratory Services.
- c. 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 storage tanks in Central Laboratory Services.
- d. 40 C.F.R. 60, Subpart VV - “Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.” Central Laboratory Services does not produce as intermediates or final products any of the materials listed in §60.489.
- e. 40 C.F.R. 60, Subpart DDD - “Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry.” Central Laboratory Services does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.
- f. 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.” Central Laboratory Services does not produce any of the chemicals listed in §60.707 as a product, co-product, by-product, or intermediate.
- g. 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 §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in Central Laboratory Services.
- h. 40 C.F.R. 63, Subpart H - “National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.” 40 C.F.R. 63 Subparts F, G, and H do not apply to manufacturing process units that do not meet the criteria in §§63.100(b)(1), (b)(2), and (b)(3).
- i. 40 C.F.R. 63, Subpart T - “National Emission Standards for Halogenated Solvent Cleaning.” There are no solvent cleaning units in Central Laboratory Services using halogenated solvents as listed in §63.460(a).

- j. 40 C.F.R. 63, Subpart JJJ - “National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins.” Central Laboratory Services does not produce the materials listed in §63.1310.
- k. 40 C.F.R. 63, Subpart EEEE – “National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).” Central Laboratory Services does not engage in the activities to distribute organic liquids.
- l. 40 C.F.R.63, Subpart FFFF – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing.” Central Laboratory Services does not manufacture any material or family of materials defined in §63.2435(b)(1)(i) through (v).
- m. 40 C.F.R. 63, Subpart MMMM - “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.” There are no surface coating activities conducted in Central Laboratory Services subject to the requirements of this rule.
- n. 40 C.F.R. 63, Subpart QQQQ - “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products.” The surface coating activities of Central Laboratory Services are excluded from the requirements of the rule because they are non-commercial operations using coatings supplied by non-refillable aerosol containers.
- o. 40 C.F.R. 63, Subpart RRRR - “National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.” The surface coating activities of Central Laboratory Services use non-refillable aerosol containers for the purpose of repairing furniture for on-site use and are excluded from the requirements of the rule.
- p. 40 C.F.R. 63, Subpart GGGG – “National Emission Standards for Hazardous Air Pollutants: Site Remediation.” Central Laboratory does not conduct site remediations as defined in §63.7957.
- q. 40 C.F.R. 63, Subpart HHHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” Central Laboratory Services does not manufacture coatings as defined in §63.8105.
- r. 40 C.F.R. 63, Subpart NNNNN – “National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production.” Central Laboratory Services does not produce a liquid HCl product.
- s. 40 C.F.R. 82, Subpart B - “Protection of Stratospheric Ozone.” Requires recycling of Chlorofluorocarbons (CFCs) from motor vehicles and that technicians servicing equipment need to be licensed. Central Laboratory Services does not conduct motor vehicle maintenance involving CFCs on site.
- t. 40 CFR 64 – Compliance Assurance Monitoring
According to 40 C.F.R. §64.2(a), CAM applies to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria: 1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under 40 C.F.R. §64.2(b)(1); 2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and 3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. 40 C.F.R. §64.2(b)(1)(i) exempts emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act; and 40 C.F.R. §64.2(b)(1)(vi) exempts emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method.

The facility does not have a pollutant-specific emissions unit with potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. It also does not have control devices to achieve compliance with an emission limitation or standard. Therefore, CAM does not apply.

u. Greenhouse Gas Tailoring Rule

This is a renewal Title V Permit and there have been no changes 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: November 8, 2013

Ending Date: December 9, 2013

Point of Contact

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

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
michael.egnor@wv.gov

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.

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.