

Fact Sheet



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

Permit Number: **R30-10700001-2019**

Application Received: **June 21, 2018**

Plant Identification Number: **107-00001**

Permittee: **DuPont Specialty Products US, LLC**

Facility Name: **Washington Works**

Development and Laboratory Services (Part 13 of 14)

Mailing Address: **P.O. Box 2800, Washington, WV 26181-1217**

Physical Location:

Washington, Wood County, West Virginia

UTM Coordinates:

442.103 km Easting • 4,346.800 km Northing • Zone 17

Directions:

From I-77 take the Route 50 By-pass around Parkersburg towards Ohio. At the last exit in West Virginia (DuPont Road) exit the divided highway. At the stop light turn left onto DuPont Road. Continue down DuPont Road approximately ½ mile. The plant will be visible on the right side of the road. Enter at the main gate.

Facility Description

Development and 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.

Emissions Summary

Development and Laboratory Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2017 Actual Emissions
Carbon Monoxide (CO)	0.07	< 0.01
Nitrogen Oxides (NO _x)	0.01	< 0.01
Particulate Matter (PM _{2.5})	0.00	0.02
Particulate Matter (PM ₁₀)	0.98	0.02
Total Particulate Matter (TSP)	0.98	0.02
Volatile Organic Compounds (VOC)	0.55	0.02
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2017 Actual Emissions
Total HAP's	0.17	< 0.01

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

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 Specialty Chemicals 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	Open burning prohibited.
	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction, modification, relocation, etc.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
State Only:	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	45CSR4	No objectionable odors.
	45CSR27	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>)
R13-2617J	10/5/2017	PD19-001
R13-2330H	9/22/2017	PD19-001

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

This renewal Permit includes R30-10700001-2013 MM02 (Part 13 of 14). Since the most recent version of this permit, the following changes have been made:

As a result of R30-10700001-2013 MM02:

1. In the Section 1.1 Emission Units Table, Demag #6 has been added to Emission Point ID L046E. Eventually, Demag #6 will replace Demag #5, but as of this Permit issuance, they will be jointly operating through similar Emission Point L046E. There is no change in emission limits in Condition 5.1.1 as a result of the addition of Demag #6. This change was submitted as a permit determination PD19-001 and the Division of Air Quality determined on January 3, 2019 that a permit would not be required for the change.
2. Demag #6 has been added to Appendix A – Attachment A of the Permit based on PD10-001.

Other changes in this Permit include:

1. The mailing address and phone number for the Permittee have been updated.
2. The US EPA mailing address has been updated in Condition 3.5.3.
3. The non-applicability section for Condition 3.7.2 has been updated.
4. The Permittee name has been changed from "E. I. du Pont de Nemours and Company" to "DuPont Specialty Products US, LLC". The Permit transfer was approved on February 12, 2019.

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 Development and 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 Development and 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 Development and 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." Development and 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." Development and 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." Development and 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 Development and 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 Development and 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." Development and 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)." Development and 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.” Development and 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 Development and 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 Development and 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 Development and 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.” Development and Laboratory does not conduct site remediations as defined in §63.7957.
- q. 40 C.F.R. 63, Subpart HHHH – “National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing.” Development and Laboratory Services does not manufacture coatings as defined in §63.8105.
- r. 40 C.F.R. 63, Subpart NNNN – “National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production.” Development and 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. Development and Laboratory Services does not conduct motor vehicle maintenance involving CFCs on site.
- t. 40 C.F.R. 63, Subpart DD – “National Emission Standards for Hazardous Air Pollutants From Off-Site Waste and Recovery Operations.” The Development and Laboratory Services Area does not receive off-site materials as specified in paragraph 40 C.F.R §63.680(b) and the operations are not one of the waste management operations or recovery operations as specified in 40 C.F.R. §63.680(a)(2)(vi).
- u. 40 C.F.R. 63, Subpart WWW – “National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production.” The Development and Laboratory Services Area does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.
- v. 40 C.F.R. 63, Subpart DDDDD – “National Emission Standards for Hazardous Air Pollutants: Industrial/Commercial/Institutional Boilers and Process Heaters.” The Development and Laboratory Services Area does not own or operate an industrial, commercial, or institutional boiler or process heater as defined in 40 C.F.R. §63.7575.
- w. 45CSR2 – “To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.” The Development and Laboratory Services Area does not contain any fuel burning units.

- x. 45CSR10 – “To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.” The Development and Laboratory Services Area does not have any emission sources of sulfur oxides subject to this rule.
- y. 45CSR16 – “Standards of Performance for New Stationary Sources Pursuant to 40 C.F.R. 60.” The Development and Laboratory Services is not subject to any requirements under 40 C.F.R. 60.
- z. 45CSR17 – “To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.” Per 45CSR§17-6.1, the Development and Laboratory Services Area is not subject to 45CSR17 because it is subject to the fugitive particulate matter emission requirements of 45CSR7.
- aa. 45CSR34 – “Emission Standards for Hazardous Air Pollutants.” Development and Laboratory Services Area is not subject to any requirements under 40 C.F.R. 61 or 40 C.F.R. 63.
- ab. 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 Development and Laboratory Services Area 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.

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 12, 2019
Ending Date: May 12, 2019

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)

Not applicable.