

COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Blue Ridge Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Dynax America Corporation
Roanoke, VA 24019
Permit No. BRRO21279

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. Pursuant to 40 CFR Part 70 and 9VAC5 Chapter 80, Dynax America Corporation has applied for a permit to the Title V Operating Permit for its Dynax America Corporation facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

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FACILITY INFORMATION

Permittee

Dynax America Corporation
568 East Park Drive
Roanoke, VA 24019

Facility

Dynax America Corporation
568 East Park Drive
Roanoke, VA 24019

State-County Plant ID No. 51-023-00039

SOURCE DESCRIPTION

Facility Description: NAICS/SIC Code: 336350/3714 – The facility manufactures steel friction disks and mating plates for motor vehicle automatic transmissions and torque converters.

The facility is a Title V major source of volatile organic compounds and Hazardous Air Pollutants. This source is located in an attainment area for all pollutants, and is not a PSD major source for any pollutant. The facility was first permitted as a new stationary source in December 1996. Since that time the facility has received multiple permits for various projects at the facility. The facility currently operates under two minor new source review permits dated June 10, 2009 and March 19, 2013.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emission units at the facility are reflected in the Title V permit in Emission Units table on Page 2 of the permit and Condition 67 (Insignificant Units).

The two NSR permits utilize differing terminology to cover similar equipment. The term “incineration unit” utilized in the 2009 permit has been replaced with the term “oxidizer” used in the 2013 permit. The term “adhesive line” (2009) has been replaced with “coating line” (2013). “Saturation line” continues to refer to the processes that apply the friction resin to paper. These changes have been made to simplify the permit. Where these terms are used for a specific list of equipment, and not all such equipment at the facility, a listing of the applicable Equipment IDs is included in the permit condition.

EMISSIONS INVENTORY

Emissions from the facility for 2012 have been reviewed and approved (12.9 TPY VOC).

EMISSION UNIT APPLICABLE REQUIREMENTS

The following section discusses requirements for the emissions units at the facility that are subject to Title V permitting. These requirements come from the NSR permit and applicable federal requirements. The conditions are not repeated verbatim from the permit. The regulatory authority for each condition is listed in parentheses () below each condition in the permit.

Citations

The following citations denote the underlying authorities to implement the specific conditions in the NSR permits:

9VAC5-50-260, 9VAC5-80-1180, 9VAC5-80-1200, 9VAC5-50-50, 9VAC5-50-20, 9VAC5-50-90, 9VAC5-50-30, 9VAC5-50-410, 9VAC5-60-30, 9VAC5-60-100

Process Equipment Requirements

Limitations

The NSR permits contain limitations regarding control devices use, control and capture efficiencies, process throughputs, and emission limitations, including visible emissions. Requirements for the surface treatment process are included, continuing the previous inclusion of these requirements, to ensure they remain federally-enforceable. Except for the surface treatment lines and TC Line 2, the equipment in this section is subject to MACT JJJJ or MACT MMMM, which are discussed later in this document.

Monitoring, Testing, and Recordkeeping

Continuous monitoring of oxidizer temperature, enclosure pressure for each coating line, and Surface Treatment Line 2 (ST2) scrubber liquid flow and pH are required. The ranges are set by previous performance tests for each of these units. The testing requirements for units currently approved but not yet constructed are included for oxidizer and capture efficiencies. The facility is required to keep records of many daily operating parameters for each coating line, mainly regarding the properties of each coating/diluent and the amount applied.

The Surface Treatment Line 3 (ST3) is subject to compliance assurance monitoring (CAM) for HAP emissions. The pre-control potential to emit is greater than 10 TPY for HCl, with controlled emissions of 1.3 TPY considering the required 98% control efficiency. The CAM plan continuously monitors scrubber liquid flow rate and pH to ensure 98% control is maintained. A stack test is required with this renewal to verify operation within the ranges is compliant with the emissions limitation.

Considering the above, the O&M requirements in the facility-wide section, natural gas combustion, the lack of visible emissions from these unit types, and the MACT compliance requirements, the monitoring is sufficient to assure compliance with the requirements of this section.

Streamlined Requirements

There are several frequently used NSR conditions for coating operations that were duplicated in each of the underlying permits. Where these conditions, and associated recordkeeping, were duplicated, the item

was not duplicated in this Title V permit with both conditions referenced as the underlying authority. The testing for SFRC-1 in the 2009 permit has been completed and is not included. The oxidizer visible emissions limitations from the underlying permits are more stringent than the new and modified source standard in 9VAC5-50-80. The alkaline scrubber visible emissions limitation representing proper operation and maintenance of the scrubber is also more stringent than the standard in 9VAC5-50-80.

Facility Wide Requirements

This section contains a facility wide limitation on VOC emissions limit and the proper O&M requirement for the permitted equipment.

Records of maintenance and training are required, as well as recordkeeping of the emissions calculations to demonstrate compliance with the facility-wide limit. Considering the monitoring in the permit, this recordkeeping is considered sufficient to assure compliance with the requirements of this section.

The general condition regarding construction to allow for testing is included from the underlying permits.

Emergency Engine (WWGEN) Requirements

The facility has one propane-fired emergency spark-ignition stationary engine (SI ICE) with a rating of 126 bhp. The engine is subject to 40CFR60 Subpart JJJJ and 40CFR63 Subpart ZZZZ. The MACT requires this type of engine to comply through compliance with the NSPS. The permit includes the requirements of the NSPS, such as the emissions limitations, methods of compliance, and the necessary recordkeeping and reporting. The new and modified source visible emission limitation is included in this section. A properly operated and maintained propane-fired engine is not expected to produce visible emissions. The monitoring, recordkeeping, and reporting requirements of the NSPS are sufficient to assure compliance with the requirements of this section.

MACT JJJJ and MMMM Requirements

The facility has selected the compliance option in MACT MMMM where compliance with the requirements for the predominant activity is compliance with the requirements for MACT MMMM. The predominant activity at Dynax is the paper coating subject to MACT JJJJ. The permit requires the submittals in accordance with this option and the submittal of an application to add the applicable requirements for MACT MMMM if this compliance option ceases to be available at this facility. The affected source for MACT JJJJ is the collection of coating and saturation lines. The facility complies with the requirements via capture and control of the VHAP emissions from the operations. The monitoring, recordkeeping, and reporting required by the MACT is also included and is sufficient to assure compliance with the MACT standards.

Natural Gas Boiler (BOILER) Requirements

The facility has a small natural gas fired boiler subject to the 5 year tune-up requirement of the MACT (40CFR63 Subpart DDDDD). The requirements of the MACT are included in this section. A properly operated and maintained natural gas boiler is not expected to produce visible emissions. The monitoring, recordkeeping, and reporting of the MACT is included and is sufficient to assure proper operation and maintenance and compliance with the standards.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9VAC5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the Code of Virginia, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

This general condition cite(s) the Article(s) that follow(s):

Article 1 (9VAC5-80-50 et seq.), Part II of 9VAC5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9VAC5-80-80. Application

9VAC5-80-140. Permit Shield

9VAC5-80-150. Action on Permit Applications

Failure/Malfunction Reporting

9VAC5-20-180 requires malfunction and excess emission reporting within four hours of discovery. 9VAC5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. 9VAC5-20-180 is from the general regulations. All affected facilities are subject to 9VAC5-20-180 including Title V facilities. 9VAC5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9VAC5-20-180 and 9VAC5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

In order for emission units to be relieved from the requirement to make a written report in 14 days the emission units must have continuous monitors meeting the requirements of 9VAC5-50-410 or 9VAC5-40-41.

This general condition cites the sections that follow:

9VAC5-40-41. Emissions Monitoring Procedures for Existing Sources

9VAC5-40-50. Notification, Records and Reporting

9VAC5-50-50. Notification, Records and Reporting

This general condition contains a citation from the Code of Federal Regulations as follows:
40 CFR 60.13 (h). Monitoring Requirements.

Permit Modification

This general condition cites the sections that follow:

9VAC5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9VAC5-80-190. Changes to Permits.

9VAC5-80-260. Enforcement.

9VAC5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9VAC5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9VAC5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9VAC5-80-250 and 9VAC5-20-180.

This general condition cites the sections that follow:

9VAC5-20-180. Facility and Control Equipment Maintenance or Malfunction

9VAC5-80-110. Permit Content

Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:

40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.

40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.

40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

9VAC5-60-70. Designated Emissions Standards

9VAC5-80-110. Permit Content

STATE ONLY APPLICABLE REQUIREMENTS

None

FUTURE APPLICABLE REQUIREMENTS

None

INAPPLICABLE REQUIREMENTS

A letter from DEQ dated June 16, 2005 determined Dynax does not manufacture friction products covered by 40CFR63 Subpart QQQQ.

A letter from DEQ dated July 10, 2006 determined Saturation Line 1 does not meet the definition of coating operation covered by 40CFR63 Subpart MMMM.

The VOC emissions (e.g., methanol) from the facility are subject to 40 CFR 63 Subpart JJJJ and MMMM, MACTs promulgated after November 15, 1990. Therefore, CAM does not apply to the coating lines per 40 CFR 64.2(b)(1)(i). The only coating line not subject to either MACT is the torque converter line 2 (TCLC2 permitted as part of TC), which does not have an uncontrolled PTE greater than a major source threshold. ST2 does not have pre-control potential to emit greater than 10 TPY for HCl. Therefore, CAM does not apply to this unit per 40CFR64.2(a)(3).

The facility does not have any applicable requirements for greenhouse gases.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9VAC5-80-110.

Insignificant emission units are shown in the table contained in Condition 67 of the permit. The storage tanks are part of the affected source of the applicable coating MACTs; however there are no standards for these units. Storage tanks not part of the source category have less than 5,000 gallons capacity (vessels for Sat1 and TC2). Storage tanks that are part of another source category or have a capacity less than 5,000 gallons are not subject to the requirements of 40CFR63 Subpart EEEE.

CONFIDENTIAL INFORMATION

No confidential information request has been made. All portions of the Title V permit and application are available for public review.

PUBLIC PARTICIPATION

The draft permit will be published in the Roanoke Times on August 5, 2014. The public comment period runs from August 5, 2014 to September 4, 2014. No comments were received from the public, affected states, and EPA.